

Georgia Department of Natural Resources

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Noel Holcomb, Commissioner

Environmental Protection Division

Carol A. Couch, Ph.D., Director

404/656-2833

January 10, 2007

VIA MAIL COURIER

Ms. Carolyn Callihan
Superfund Site Assessment Manager
U.S. Environmental Protection Agency
Waste Management Division
Superfund Site Evaluation Section
61 Forsyth Street, SW
Atlanta, Georgia 30303-3104

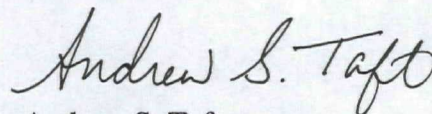
SITE: AZS Chemical
BREAK: 1.8
OTHER: v.1

RE: AZS Chemical Company (a.k.a. Cargill)
Atlanta, Fulton County, Georgia
Preliminary Assessment Report

Dear Ms. Callihan:

Enclosed you will find a Preliminary Assessment (PA) report for the above referenced site. Should you have any questions or comments regarding the report, please contact Mr. Lawrence Papetti at (404) 657-8682.

Sincerely,



Andrew S. Taft
CERCLA Pre-Remedial Coordinator
Hazardous Waste Management Branch

cc: Bruce Khaleghi, EPD (w/o enclosure)
Lawrence Papetti (w/o enclosure)

File: CERCLA Pre-Remedial (FY-2008)
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**PRELIMINARY ASSESSMENT
AZS CHEMICAL CO. (a.k.a. CARGILL)
762 MARIETTA BLVD. N.W.
ATLANTA, FULTON COUNTY, GEORGIA
EPA ID #s GAD981237225 & GAD057288144**

*PA Approved
4/7/08
CPC
SI ~~not~~ warranted
at this time
due to State
RCRA status.*

PREPARED FOR:

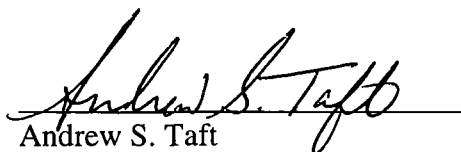
**U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IV
ATLANTA FEDERAL BUILDING
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303-3415**

PREPARED BY:

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January 2008

TABLE OF CONTENTS

LIST OF SECTIONS

- 1.0 INTRODUCTION
- 2.0 SITE DESCRIPTION, OPERATIONAL HISTORY, AND WASTE CHARACTERISTICS
 - 2.1 Location
 - 2.2 Site Description
 - 2.3 Operational History and Waste Characteristics
- 3.0 GROUNDWATER PATHWAY
 - 3.1 Hydrogeologic Setting
 - 3.2 Groundwater Targets
 - 3.3 Groundwater Conclusions
- 4.0 SURFACE WATER PATHWAY
 - 4.1 Hydrologic Setting
 - 4.2 Surface Water Targets
 - 4.3 Surface Water Conclusions
- 5.0 SOIL EXPOSURE AND AIR PATHWAYS
 - 5.1 Physical Conditions
 - 5.2 Soil and Air Targets
 - 5.3 Soil Exposure and Air Pathway Conclusions
- 6.0 SUMMARY AND CONCLUSIONS
- 7.0 LIST OF REFERENCES

LIST OF FIGURES

- Figure 1: Site Location Map
- Figure 2: Site Topographic Map
- Figure 3: Groundwater Potentiometric Surface Map, September 24, 2007
- Figure 4: Wetland Inventory Map Showing Surface Water Pathway

LIST OF APPENDICES

- Appendix A: Trip Report, Preliminary Assessment (PA) Site Reconnaissance on November 29, 2007
- Appendix B: Selected References

**NARRATIVE
PRELIMINARY ASSESSMENT
AZS CHEMICAL COMPANY
ATLANTA, FULTON COUNTY, GEORGIA**

1.0 INTRODUCTION

Under the authority of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA, a.k.a. "Superfund"), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA) (Ref. 1), the Georgia Department of Natural Resources (DNR), Environmental Protection Division (EPD), Hazardous Waste Management Branch (HWMB) presents this Preliminary Assessment (PA) for the AZS Chemical Company site (a.k.a. "Cargill, Inc.," "Former Cargill Site," and "AZS Corporation"), which is located at 762 Marietta Boulevard Northwest in Atlanta, Fulton County, Georgia (the "site"). The purpose of the PA is to collect information concerning current conditions at the site necessary to assess the immediate or potential threat posed to human health and/or the environment, to determine the need for additional investigation under CERCLA/SARA or other authority and, if appropriate, support site evaluations using the Hazard Ranking System (HRS) for proposal to the National Priorities List (NPL), (Refs. 1 and 2). The scope of the PA included a review of available file documentation, a comprehensive target survey, and an on-site reconnaissance. A trip report documenting site reconnaissance conducted by EPD personnel on November 2007 is included as Ref. 48 in Appendix B. The EPD utilized the U.S. Environmental Protection Agency's (EPA's) *Guidance for Performing Preliminary Assessments Under CERCLA* (Ref. 20) in the preparation of this report. This report is organized according to Table 4-1 therein, "PA Narrative Report, Outline of Contents" (Ref. 20).

2.0 SITE DESCRIPTION, OPERATIONAL HISTORY, AND WASTE CHARACTERISTICS

Personnel of the HWMB conducted site reconnaissance (including on-site and off-site reconnaissance) on November 29, 2007 (Ref. 48). The purpose of the site reconnaissance was to collect certain information necessary to complete a Preliminary Assessment (PA) in accordance with the document entitled, *Guidance for Performing Preliminary Assessments Under CERCLA* (Ref. 20). During the site reconnaissance, HWMB personnel recorded pertinent observations by marking maps (Attachment A of Ref. 48 contains field-annotated maps.), taking photographs (Attachment B of Ref. 48 contains a photograph log and 83 photographs), and writing in the logbook (Attachment C of Ref. 48 contains copies of the logbook).

2.1 Site Location

The site is located at 762 Marietta Blvd., N.W. in Atlanta, Georgia 30318. The reconnaissance team determined the coordinates of the Site Reference Point during the November 29, 2007 site reconnaissance (Ref. 48). The Photographic Log and the caption for Photo 16 (Contained in Attachment B of Ref. 48.) give the latitude and longitude measured for the Site Reference Point. Attachment A3 of Ref. 48, a map, shows the Site Reference Point location. Photo 16 of Ref. 48 shows the actual Site Reference Point location on the ground. The geographical coordinates of the site reference point are 33.77629 degrees North Latitude and 84.42834 degrees West Longitude, with accuracy within 14 feet (Ref. 48). Method Accuracy Description (MAD) data, according to the format requirements of the document, "Quick Reference Guide, Entering Latitude/Longitude Data" (Ref. 22) and based on field data (Ref. 48), are as follows:

- *Accuracy:* 4.3 meters.
- *Collection Method:* Geographic Positioning System (GPS) Code (Pseudo Range) Differential (corresponds to use of a recreational grade GPS receiver).
- *Reference Datum:* NAD83 (datum used by GPS receiver).
- *Reference Point:* The site reference point is at the intersection of two site roads (Ref. 48). The EPD chose this reference point for the following reasons:
 - It is a convenient aspect of the site,
 - It is accessible for field verification,
 - It is located between the the Polymer Pond and the Series Pond Area, at the approximate geographic center of the site's major sources, and
 - It is identifiable based on an intersection of site roads shown on a topographic map (Figure 1).
- *Source Map Scale:* None (used GPS receiver):

- *Verification Method (optional)*: DOQQ verified using USGS Americus, Georgia 1:24,000 scale topographic quadrangle map.
- *Source (optional)*: *Field data (Ref. 48)*
- *Point/Line/Area (optional)*: Not determined.
- *Measurement Sequence (optional)*: Not determined.
- *Collection Date*: *November 29, 2007 GPS reading (Ref. 48).*

A concrete benchmark monument is located on the southwestern portion of the site (Photo 67 and Attachment A1 of Ref. 48). The caption of Photo 67 lists the coordinates and elevation recorded on the benchmark monument. This PA does not designate the concrete benchmark monument as a Site Reference Point because it is located further from the geographic center of the sources than the chosen Site Reference Point is.

2.2 Site Description

The former AZS facility at the site is closed and no buildings exist on site other than a single, open-sided shed housing the groundwater treatment system, and shacks built and occupied by indigents (Refs. 6 and 48). Figure 1 (modified from Ref. 25) is an enlarged copy of the Northwest Atlanta USGS 7.5 minute topographic quadrangle map showing the site boundary, and the site's major sources: the Polymer Pond and the Series Pond Area. Figure 2 (modified from Ref. 25) is a topographic map showing the site boundaries, site topography at a 2-foot contour interval, the site's major sources, and other pertinent site features. Attachment A3 of Ref. 48 (modified from Ref. 24) is an aerial photograph showing the Polymer Pond and the Series Pond Area. Attachment A7 of Ref. 48 (a drawing excerpted from Ref. 11) shows the location of a pre-RCRA pond once located adjacent to the Series Pond Area. Site features include, but are not limited to the following: concrete foundations of former buildings, the groundwater treatment system and shed, paved roads, filled surface impoundments, monitoring and recovery wells, roads, a chain-link perimeter fence breached in several places, open and/or unsecured gates, drums with uncertain contents, streams, forest, inactive railroad spurs, abandoned piping, and indigent shelters (Ref. 48).

Based on the site boundaries marked on Figure 1, the site area is approximately 14 acres, or 595,000 square feet (Refs. 3 and 25). The site boundaries converge to a point on the northern end of the site (Photos 76-78 in Ref. 48, and Figures 1 and 2). A cleared power transmission line corridor and a large power substation border the site to the north and northwest (Photo 77 of Ref. 48 and Figure 1). According to the 2004 Part B Application, the Georgia Power Company owns the property north of the site (Ref. 25). A forested area borders the site to the northwest and west (Photos 76-78 of Ref. 48). A cleared, aboveground power transmission line corridor crosses the southern portion of the site in an east-west direction (Ref. 48). An open, brushy area is located west of the site

underneath the power transmission lines (Ref. 48). Loveless Avenue, an abandoned street, runs in an east-west direction immediately south of the southern boundary fence (Photo 52 in Ref. 48). A parking lot is located south of the southwestern portion of the site and a forest is located south of the southeastern portion of the site (Photo 52 of Ref. 48). A railroad corridor borders the site to the east (Photo 78 of Ref. 48). According to the 2004 Part B Application, CSX owns the railroad east of the site, and properties bounding the site to the west include Bankhead Welding and an abandoned dump (Ref. 25).

2.3 Operational History and Waste Characteristics

2.3.1 Ownership

According to the September 2004 Post Closure Care and Hazardous Waste Permit Application for the AZS Chemical Site, prepared for the AZS Corporation by Dobbs Environmental, Inc., the title to the property was held by United Technologies; AZS retained the title to the area in the footprint of the closed surface impoundments and to the monitoring and remediation system (Ref. 25). According to a September 19, 2006 memorandum, a group purchased the property around the Polymer Pond and the Series Pond Area and was preparing to develop it; however, the new owners refused to accept RCRA liability (Ref. 53). A November 30, 2007 HWMB internal memorandum regarding ownership and operating history (containing copies of the pertinent deeds) documented that AZS still owns the regulated units, and United Real Property Investment, LLC owns the surrounding parcel (Ref. 49).

2.3.2 Operational History

From the early 1900s until 1972, the facility manufactured specialty organic chemicals (Ref. 6). The facility produced a large, undocumented, and therefore indefinite array of products and wastes throughout its lifetime (Ref. 11). In 1972, Sydel-Woolley & Company merged with AZ Products and became AZS Chemical Company, a division of the AZS Corporation (Ref. 6). The AZS Chemical company produced organic chemicals at the site, including (Ref. 11):

- Adhesives,
- Polymers,
- Textile chemicals, and
- Specialty amines.

The facility used the following primary organic processes (Ref. 11):

- Emulsion polymer production,

- Alkyd resin production,
- Hydrogenation, and
- Production of textile finishing and size chemicals.

According to the 2004 Draft Part B Permit Application, the AZS Chemical Company handled hazardous wastes until 1985, when it discontinued manufacturing at the site (Ref. 25). The Draft Part B Permit Application also stated that manufacturing and waste-handling practices had taken place since the early 1900s (Ref. 25).

The AZS Chemical Company treated its wastewater in surface impoundments until November 7, 1985 (Ref. 11). After November 7, 1985 the facility discharged to the City of Atlanta sanitary sewer after processing in an aboveground pretreatment plant (Ref. 11).

AZS possessed Hazardous Waste Facility Permit No. HW-051(D), which expired on September 30, 1997 for post closure care of four inactive, out of service surface impoundments; three impoundments were combined and regulated collectively as one regulated unit called the Series Pond Area and the fourth impoundment was regulated as the Polymer Pond (Refs. 6, 7, and 18). This PA designates the RCRA Series Pond Area as a single surface impoundment.

A RCRA monitoring well network exists throughout the site, and a pump and treat system to remediate groundwater contamination around the Series Pond Area is currently operational (Ref. 48). Currently, the AZS Corporation has a permit with the City of Atlanta to discharge the effluent from a groundwater treatment system to the sanitary sewer (Permit UG-117).

2.3.3 Regulatory History

The regulatory history of the site includes the following events under CERCLA, the Resource Conservation and Recovery Act (RCRA) incorporated by the Georgia Hazardous Waste Management Act, and the Georgia Hazardous Sites Response Act (HSRA):

CERCLA:

The EPA's, Superfund Information Systems database (CERCLIS) lists the AZS Chemical Company under EPA ID No. GAD057288144 (Ref. 26). According to the CERCLIS Archive, the site was Discovered under EPA ID No. GAD057288144 in CERCLIS on July 1, 1980, with a PA completion date (No Further Remedial Action Proposed—NFRAP) of September 17, 1995 (State-lead) and an archival date of December 19, 1996 (Ref. 26).

A February 25, 1999 Federal Register Notice (Volume 64, Number 37, Page 9349) records a Notice of Lodging of Consent Decree Under CERCLA indicating the lodging

of a proposed consent decree, United States of America v. AZS Corporation, et al., Civil Action No. 99-464 in the United States District Court for the District of New Jersey (Ref. 49). The United States' underlying complaint sought recovery of response costs under CERCLA (Ref. 49). A Consent Decree was entered and the Notice of Lodging of Consent Decree and Court Case 2:99-cv-00464-DRD in the US District Court of New Jersey was closed on April 13, 1999 (Ref. 49).

RCRA:

The RCRAInfo database lists the site under the name AZS Corporation, EPA ID No. GAD981237225 (Ref. 50). RCRAInfo and HWMB files document the following RCRA events for the site:

- A June 3, 1987 RCRA Facility Assessment (RFA) Report (Ref. 11).
- A July 1987 Post Closure Care Permit Application for two surface impoundments (Ref. 8).
- A September 30, 1987 Hazardous Waste Permit No. HW-051(D), for post-closure care of two surface impoundments, valid through September 30, 1997 (Ref. 7).
- A 1989 generator notification by Cargill, Inc., under EPA ID No. GAD057288144, for the following waste codes: U031, U220, D002, and U122 (Ref. 29).
- A 1993 generator notification by Cargill, Inc. under EPA ID No. GAD057288144, for wastes no longer used due to plant closing, including the following waste codes: D001, U009, and U162 (Ref. 29).
- A March 31, 1993 Amendment to Hazardous Waste Facility Permit No. HW-051 (D) resulting from a 5-year review (Ref. 20).
- The AZS Corporation, under EPA ID No. GAD981237225, has received several violations and Notices of Deficiency (NODs) for the failure to comply with permit requirements, such as: failure to operate a corrective action system, failure to submit a semi-annual report, failure to properly manage a hazardous waste container, and failure to inspect and maintain wells within permit requirements (Ref. 29). The AZS Corporation, under EPA ID No. GAD981237225, has previously notified as a generator for wastes from groundwater remediation activities at the site (Ref. 29).
- Hazardous Waste Permit No. HW-051(D) expired on September 30, 1997 and the AZS Corporation has not submitted an acceptable permit renewal Part B Application (Ref. 25).
- In 1997, the Cargill, Inc., under EPA ID No. GAD057288144, received a violation for failure to perform hazardous waste determinations at the site (Ref. 29).

- A 1998 Court of Appeals Case, *Reheis v. AZS Corporation* shows AZS was held responsible for rehabilitating groundwater at the site (Ref. 49).
- On August 30, 2000, the EPD sent a letter to AZS containing a proposed consent order, drafted by EPD according to previously discussed settlement conditions (Ref. 60).
- During September 2004, the site submitted a Post Closure Care and Hazardous Waste Permit Application for the AZS Chemical Site, Fulton County, Atlanta, Georgia, 2004 Permit Renewal (Ref. 25). On April 18, 2005, the HWMB issued comments on deficiencies in the application, drafts of which had also previously been submitted, reviewed and determined to be deficient by the EPD (Ref. 56).

Although the Post Closure Care Permit expired in 1997 (Ref. 18) and AZS has not renewed it, semi-annual groundwater monitoring and groundwater remediation activities continue at the site (Refs. 9 and 51). EPD personnel recently conducted RCRA inspections noting deficiencies in operation and maintenance of the groundwater monitoring and remediation systems; HWMB personnel performed the most recent RCRA inspections on the following dates: September 24 and 27, 2007 (Refs. 5 and 6), November 29, 2007 (Documented in Ref. 17, performed concurrently with PA site reconnaissance documented in Ref. 48), December 19, 2007 (Ref. 64), and December 21, 2007 (Ref. 65).

HSRA:

The EPD's Hazardous Sites Response Program (HSRP) received four HSRA Notifications for the site under the name, "Former Cargill Site". The HSRA Notifications were as follows:

- A July 5, 2006 Release Notification for a release of tetrachloroethene (PCE) in groundwater at a concentration above the MCL; routine groundwater sampling identified it (Ref. 12). Although PCE had already occurred in site groundwater, its new occurrence in an upgradient-monitoring well compelled Cargill, Inc. to submit the Release Notification (Ref. 12). A 2006 Environmental Indicator (EI) report indicated that solvents in groundwater at the site are partially attributable to the City of Atlanta Sewer System. Because of a lack of drinking water wells near the site, the site scored low for the groundwater pathway and the HSRP did not list the site on the Hazardous Site Inventory (HSI) (Refs. 12 and 52).
- Three other HSRA Release Notifications occurred in 2005, 2004, and 1995 for releases of PCE in groundwater, methylene chloride in soil and groundwater, and benzene, MEK, 1,1,2,2- tetrachloroethane, and carbon disulfide in soil (Refs. 13, 14, 15, 54, and 59). The HSRP did not list the site on the HSI because of a lack of groundwater targets, and the presence of an encompassing fence around the site (Refs. 13, 14, 15, 54, and 59);

Personnel of the HWMB performed the HSRA-related site inspections on the following dates: May 26, 2004 (Ref. 16), July 1, 2004 (Ref. 15), September 21, 2004 (Ref. 14), June 1, 2005 (Ref. 13), and October 26, 2006 (Ref. 12).

2.3.4 Waste Characteristics

2.3.4.1 Hazardous Substances:

Hazardous substances associated with HSRA Release Notifications for the site are as follows (Refs. 12-15, 52, 54, and 59):

- PCE in groundwater,
- Methylene chloride in groundwater,
- Methylene chloride in soil,
- Benzene in soil,
- MEK in soil,
- 1,1,2,2-tetrachloroethane in soil, and
- Carbon disulfide in soil.

The March 31, 1993 Amendment to (now-expired) Hazardous Waste Permit No. HW-051(D) lists the following constituents and concentration limits, in milligrams per liter (mg/L), in the *Groundwater Protection Standard* (Ref. 18):

- Barium (total), 1.00;
- Cadmium (total), 0.01;
- Chromium (total), 0.05; and
- Lead (total), 0.05.

The *Groundwater Protection Standard* also lists the following Hazardous Constituents, with Background as a concentration limit (Ref. 18):

- Acetone,
- Benzene,
- Carbon disulfide,

- Chloroform,
- Cresol (Series Pond Area Only),
- Cyanide,
- 1,1-dichloroethane,
- 1,1-dichloroethylene,
- 1,4-dioxane,
- Ethyl benzene,
- Formaldehyde,
- Methyl ethyl ketone,
- Methyl isobutyl ketone,
- Methyl n-butyl ketone,
- Methylene chloride,
- Nickel,
- Tetrachloroethylene,
- Toluene,
- 1,1,1-trichloroethane,
- Trichloroethylene,
- Vinyl chloride, and
- Xylene (total).

Table 2 of the 1987 RFA, entitled *Hazardous Wastes Generated*, lists the following waste codes (Ref. 11):

- U220, F005 (toluene);
- D001 (amine forecut, epichlorohydrin, used oil mixed with F003 and F002);

- U61, F003 (MIBK);
- F003 (nonchlorinated solvents);
- F002 (chlorinated solvents); and

Table 2 of the RFA also lists the following waste codes for the surface impoundments (Ref. 11):

- U080 (methylene chloride),
- P022 (carbon disulfide),
- U002 (acetone),
- U078 (1,1-dichloroethylene),
- U044 (chloroform),
- U226 (1,1,1-trichloroethane),
- U084 (1,3-dichloropropene),
- U019 (benzene),
- U037 (chlorobenzene),
- U211 (carbon tetrachloride),
- U210 (tetrachloroethylene),
- U220 (toluene),
- U161 (methyl isobutyl ketone),
- U079 (1,2-dichloroethylene),
- U165 (naphthalene),
- U122 (formaldehyde), and
- U151 (mercury).

A November 16, 2007 RCRA Site Detail Report, Comprehensive Compliance Monitoring and Enforcement Report (CME), and Comprehensive Corrective Action

Report for Cargill, Inc. under EPA ID No. GAD057288144 list the following waste codes (Ref. 29):

- D001, U009, and U162 generated in 1993, no longer used due to plant closing, and
- U031, U220, D002, and U122 generated in 1989.

In a February 1, 2005 letter, Charles D. Williams of the HWMB stated (based on a review of documents previously submitted by AZS) that the main groundwater contaminants and their average dissolved concentrations were (Ref. 58):

- Vinyl chloride, approximately 80 Parts Per Billion (PPB);
- 1,2-dichloroethene, approximately 100 PPB; and
- Trichloroethene, approximately 10 PPB.

The size of the groundwater plume is approximately 400 ft. in length, approximately 200 ft. in width, and approximately 40 ft. in depth (Ref. 58). The plume extends into the bedrock (Ref. 58).

The target groundwater cleanup levels are the same as the Maximum Contaminant Levels (MCLs), which are (Ref. 58):

- Vinyl chloride 2 PPB,
- 1,2-dichloroethene 70 PPB, and
- Trichloroethene 5 PPB.

Although the Post Closure Care Permit expired in 1997 (and has not been renewed), the AZS Corporation performs semi-annual groundwater monitoring and groundwater remediation activities at the site (Refs. 18 and 51). Free product has not been measured at the site (Ref. 58). The most recent groundwater monitoring report available lists the presence of the following dissolved compounds in the site's monitoring and recovery wells in April and November 2006 (Ref. 51):

- Formaldehyde,
- Barium,
- Tetrachloroethene,
- Trichloroethene,
- cis-1,2-dichloroethene,

- trans-1,2-dichloroethene,
- Vinyl chloride, and
- Barium.

According to a September 19, 2006 memorandum, solvents detected in site groundwater may be partially attributable to an offsite, upgradient source (the City of Atlanta sewer system); difficulties in obtaining property access have hindered further investigation (Ref. 53).

2.3.4.2 Source Identification:

The 1987 RFA contains an inventory of the AZS Chemical Company's waste tanks, and potential Solid Waste Management Units (SWMUs—Tables 3 and 4 respectively of Ref. 11). The PA file review (including the RFA) and the PA field reconnaissance (See the Trip Report included as Ref. 48) identified several potential sources. They are as follows:

Surface Impoundments:

At the time of the 1987 RFA, all of the surface impoundments were closed (Ref. 11). They are as follows:

- **The Polymer Pond:** A surface impoundment located on the northeastern portion of the site (Figure 2 and Photos 17-19 in Ref. 48). The Polymer Pond had a capacity of 195,000 gallons (Ref. 11).
- **The Series Pond Area:** A surface impoundment located on the southwestern portion of the site (Figure 2, and Photos 40-43 and 47-51 of Ref. 48). The Series Pond Area included a 79,000-gallon neutralization impoundment, a 350,000-gallon settling pond, and a 263,000-gallon skimming pond, for a total volume of 692,000 gallons (Ref. 11). A filled, pre-RCRA process pond (a surface impoundment, shown in Attachment A7 of Ref. 48), of unknown volume, existed on the southwestern portion of the site (west of the Series Pond Area) beyond the extent of the Series Pond Area RCRA cap (Refs. 11 and 48). For the purposes of this PA and at this time, the pre-RCRA process pond is considered part of the Series Pond Area. In the RFA, the total area estimated for the Series Pond Area (including the abandoned pond) was 36,000 square feet or 0.83 acre (Ref. 11).

According to the RFA, the Polymer Plant discharged process wastewater into the Polymer Pond and the Size and Finish Area, and the Alkyd Resin plant discharged process wastewater into the Series Pond Area (Ref. 11). Table 2 of the RFA lists the

following hazardous wastes generated at the facility:

- toluene,
- amine forecut,
- MIBK,
- epichlorohydrin,
- nonchlorinated solvents,
- chlorinated solvents, and
- used oil.

Table 2 of the RFA lists the following constituents in the surface impoundments (Ref. 11):

- methylene chloride,
- carbon disulfide
- acetone
- 1,1 dichloroethylene,
- chloroform,
- 1,1,1 trichloroethane,
- 1,3 dichloropropene,
- benzene,
- chlorobenzene,
- carbon tetrachloride,
- tetrachloroethylene,
- toluene,
- methyl isobutyl ketene,
- 1,2 dichloroethylene,
- naphthalene,
- formaldehyde, and
- mercury.

Drums:

Eight drums with unknown contents are currently located in different areas of the site (Photos 12, 32-34, 36-38, and 81 of Ref. 48). The photographic log and individual photographs in Ref. 48 show the drums, and their geographic coordinates. A separate Land Disposal Unit trip report provides additional information on the drums (Ref. 17).

Site Soils:

A January 19, 2001 United Consulting memorandum presented soil analytical results related to an environmental investigation by United Consulting for transactional/development purposes (Ref. 57). Maps contained in the memorandum summarized soil detections from 1995 and 2001 for samples collected by United

Consulting and a consultant for Cargill (Kiber Environmental) for a HSRA investigation (Ref. 57). The maps show detections of the following constituents in site soils (Ref. 57):

- Methylene chloride,
- Acetone,
- Ethylbenzene,
- Xylenes,
- MEK,
- Benzene,
- 1,1,2,2-tetrachloroethane,
- cis-1-2-dichloroethene,
- Cadmium,
- Vinyl chloride,
- Chromium, and
- 1-methylnaphthalene.

According to the PA Guidance (Ref. 20, Section 3.5.1, Page 111),

Because areas of suspected contamination are usually present at CERCLA hazardous waste sites, a Likelihood of Exposure score of 550 is generally appropriate and you may assign this value as a default measure. Assign the alternative zero value only in cases where the presence of areas of contamination can be confidently ruled out.

This PA has not positively ruled out the presence of a hazardous substance within the top two feet of on-site penetrable cover (e.g., landscaped areas, bare soil, sediments, etc.) for all areas of the site. Section 3.5.1 of the PA Guidance (excerpted above) allows for the conservative assumption that hazardous substances are present on a site in areas not covered by an essentially impenetrable cover or more than 2 feet of cover material (Ref. 20). Therefore, at this time this PA assumes the presence of surficial soil contamination throughout the site for the purposes of this PA. Based on measurements from the site boundaries as marked on Figure 1, the site area is approximately 14 acres, or 595,000 square feet (Refs. 3 and 25). Because the total site area is less than 78 acres, this PA did not subtract the site area covered by pavement and other impervious surfaces. However, for future reference, Figure 2 (adapted from Ref. 25) identifies areas of concrete foundations and pavement.

Tanks:

Approximately 113 tanks were once located at the AZS facility; three tanks (Tanks 17, 18, and 29) received possible wastes according to the 1987 RFA (Ref. 11). Table 3 of the 1987 RFA lists the contents and volumes of these three tanks as follows:

Tank #17: 8,000 gallons, containing waste fuel,

Tank #18: 10,000 gallons, containing MIBK, and

Tank #19: 10,000 gallons, containing epichlorohydrin.

Former Satellite Accumulation and Drum Storage Areas:

The 1987 RFA lists the following areas on the Potential SWMU Inventory (Table 4 of Ref. 11):

R&D Satellite Accumulation Area: One 55-gallon drum,

Q & A Lab Satellite Accumulation : One 55-gallon drum, and

Outside Drum Storage Area East of Polymer Plant: An uncertain number of 55-gallon drums, but a minimum of 7 drums is estimated based on 7 types of waste listed in RFA Table 4.

Other Sources:

AZS operated five emission scrubbers and one thermal incinerator under EPD Air Protection Branch Permit Nos. 2819-060-6536, 2869-060-9356, and 2869-060-9541 (Ref. 11). The Georgia Air Pollution Compliance Program estimated a total hydrocarbon emission rate of five tons/year, mostly composed of toluene vapors (Ref. 11). However, because the scrubbers no longer exist, this PA disregards them as sources.

A large tarp, covering unknown items, is located on the western portion of the site (Photo 68 of Ref. 48). The field team did not pull back the tarp because of its proximity to Indigent Camp #5; for safety and privacy reasons (See HASP in Attachment E of Ref. 48), the field team attempted to minimize contact with the indigents living on the site. Although the tarp may have contained provisions used by the indigents, it could possibly be a hazardous waste source. However, because it was tightly covered by a well-secured tarp, it was located on a concrete slab, and it would make a relatively small contribution to the waste quantity (PA Table 1), at this time and for the purposes of this PA, it is disregarded as a source. Any future investigations should attempt to identify the tarp's contents.

3.0 GROUNDWATER PATHWAY

3.1 Hydrogeologic Setting

The site is in the Piedmont Geologic Province (Ref. 11). Micaceous, silty fine sand and weathered mica schist bedrock comprise the matrix of the uppermost aquifer at the site (Ref. 58). The soil overburden and the weathered/fractured bedrock act as a single aquifer unit (Ref. 11). The average depth to groundwater is 10-15 feet below ground surface (Ref. 58). The saturated effective porosity is 21% (Ref. 58). The hydraulic conductivity of the surficial aquifer is $1.8E+05$ ft/sec (Ref. 58).

Bedrock occurs at a depth of approximately 15 feet at the site (Ref. 11). The bedrock underlying the site is part of the Clairmont Formation of the Atlanta Group, and drilling logs describe bedrock underlying the site as primarily biotite-plagioclase-rich gneiss (Ref. 11). The bedrock is recharged locally through fractures (Ref. 11). The hydrologically active zone extends approximately 20 feet into the bedrock (Ref. 11).

The groundwater flow direction in the uppermost aquifer at the site (i.e. the overburden and fractured bedrock) is generally to the northwest, as determined on September 24, 2007 during a CEI Inspection, and as indicated in the 2004 draft Part B Permit Application (Refs. 5, 6 and 25). Figure 3 is a potentiometric surface map for September 24, 2007 (Ref. 5). According to the RFA, groundwater from the northern portion of the site (including the polymer pond area) discharges into Bellwood Branch (Ref. 11).

3.2 Groundwater Targets

The site-specific groundwater Target Distance Limit (TDL) is limited to that area located within 4 miles of the designated site reference point (Ref. 48). Only those groundwater targets located within the groundwater TDL are considered for the purposes of this PA.

3.2.1 Population drinking groundwater

On November 29, 2007, the reconnaissance team identified four water spigots connected to the groundwater treatment system at the Series Pond Area (Photos 63-66 of Ref. 48). Three of the spigots were located at the wellheads of recovery wells RW-2, RW-3, and RW-4; one spigot was located at the remediation system shed (Ref. 48). Attachment A1 of Ref. 48 identifies the recovery well and remediation system shed locations. The spigots at RW-4 and the remediation system shed produced water when turned on during the PA reconnaissance (Ref. 48). The circuit boxes for RW-2 and RW-3 had power (indicator lights were on), but the circuit breakers had been tripped and the wells were not pumping at the time of the PA reconnaissance (Ref. 48).

The ground around well RW-4 was trampled, the well was a few feet from a footpath between indigent camps, and the groundwater remediation system spigots were accessible and unlocked (Ref. 48). The EPD suspects that indigents have use the spigots

connected to the groundwater remediation system to obtain groundwater from the recovery wells for domestic use (Ref. 48). Based on a total of 15 indigent camps located on and around the site (Ref. 48), and an average household population of 2.3 listed for the City of Atlanta in the 2000 U.S. Census (Ref. 40), there is an estimated population of 35 suspected of drinking from the three groundwater recovery system wells (RW-2, RW-3, and RW-4).

According to the 1990 U.S. Census, there were no households with domestic wells within 1 mile of the site (Ref. 23). The 1990 U.S. Census identified a population of 69 living between 1 and 4 miles from the site and drinking from domestic wells (Ref. 23).

The 1987 RFA indicated that two process wells existed at the site (Ref. 11). The process wells were not used for drinking, and PA reconnaissance did not locate them in the field (Refs. 11 and 48). Therefore, this PA disregards them as drinking water targets.

3.2.2 Groundwater Resources

This PA has not positively confirmed the beneficial use of groundwater for purposes other than drinking water (e.g., irrigation of commercial food crops, watering of commercial livestock, etc.) to currently occur within four miles of the site reference point. Regardless, Section 3.3.2 of the PA Guidance (Page 75) allows for the conservative assumption that groundwater often has some beneficial use for purposes other than drinking water (Ref. 20).

3.3 Groundwater Conclusions

For the purposes of this PA, a release of a hazardous substance from the site to groundwater is suspected based on analytical evidence of groundwater contamination listed in Hazardous Waste Permit No. HW-051(D), and recent groundwater monitoring reports (Refs. 7, 18, 25, 51, and 58). The average dissolved contaminant concentrations of the main groundwater contaminants are (Ref. 58):

- Vinyl chloride, approximately 80 Parts Per Billion (PPB);
- 1,2-dichloroethene, approximately 100 PPB; and
- Trichloroethene approximately 10 PPB.

The most recent groundwater monitoring report available lists the presence of the following dissolved compounds in the site's monitoring and recovery wells in April and November 2006 (Ref. 51):

- Formaldehyde,
- Barium,

- Tetrachloroethene,
- Trichloroethene,
- cis-1,2-dichloroethene,
- trans-1,2-dichloroethene,
- Vinyl chloride, and
- Barium.

For the purposes of this PA, it is suspected that groundwater targets located within the groundwater TDL have been impacted by a release of a hazardous substance from the site to groundwater based on the existence of an indigent population suspected to drink contaminated groundwater. The EPD has identified three remediation system recovery wells (RW-2, RW-3, and RW-4), located at the Series Pond Area, as Primary Targets in the Groundwater Pathway based on the following rationale:

- The purpose of the recovery wells is to remove documented groundwater contamination (Refs. 18, 25, 51, and 58); and
- The EPD suspects that an estimated indigent resident and nearby population of 35 is drinking water derived from the on-site recovery wells (Refs. 40 and 48).

In conclusion, the Groundwater Pathway by itself warrants further evaluation under the HRS at this time.

4.0 SURFACE WATER PATHWAY

4.1 Hydrologic Setting

The site-specific hydrologic setting is sub-divided into the Overland Run-Off Route (Overland Segment) and the Surface Water Target Distance Limit (In-Water Segment) as follows:

4.1.1 Overland Run-off Route (Overland Segment)

The Overland Run-Off Route (OROR) is the migration route that run-off would follow from a particular on-site source to a perennial surface water body (Refs. 2 and 19). Any point at which site run-off enters a perennial surface water body is a Probable Point of Entry (PPE- Refs. 2 and 19).

The site is approximately 2,500 feet west of a surface drainage divide (Refs. 3 and 11). Attachment A2 (modified from Ref. 25) of the PA site reconnaissance trip report (Ref. 48) is an enlarged copy of the Northwest Atlanta USGS 7.5 minute topographic quadrangle map; it shows the OROR and the PPE (Refs. 3, 25, and 48). Attachment A3 of Ref. 48 (modified from Ref. 24) is an aerial photograph showing the OROR and the PPE.

Surface drainage from the Polymer Pond flows northward, through a swale, a distance of approximately 130 feet into Bellwood Branch (Photos 19 and 21 and Attachment A1 of Ref. 48); it continues downstream on Bellwood Branch a distance of approximately 1,200 feet into Proctor Creek at the PPE (Photos 70-75, Attachment A2 and Attachment A3 of Ref. 48). Based on a floodplain map (Attachment A4 of Ref. 48), the western portion of the site is within the 100-year flood plain boundary along Bellwood Branch. Bellwood Branch enters the site from a culvert underneath the railroad tracks along the eastern site boundary on the northeastern portion of the site (Attachment A1 of Ref. 48), and flows across the site toward the southwest, exiting the site along the western-central site boundary.

Surface drainage from the Series Pond Area and the pre-RCRA pond flows through a ditch over a distance of approximately 700 feet, to Bellwood Branch (Photo 43 and Attachment A3 of Ref. 48). Drainage from the Series Pond then continues a distance of approximately 300 feet into Proctor Creek at the PPE (Photos 73-75 and Attachment A3 of Ref. 48). A small stream once existed beneath the Series Pond Area, prior to construction of the AZS facility (Ref. 11). Surface drainage from all points of the site flows to Bellwood Branch and continues to Proctor Creek (Attachments A1-A3 of Ref. 48). Attachment A1 of Ref. 48, which is a topographic map with a 2-foot contour interval, identifies the pathways that runoff from individual site areas would follow.

Photos 73-75 of Ref. 48 show the PPE at the confluence of Bellwood Branch and Proctor Creek. The Photographic Log and photograph caption for Photo 73 in Ref. 48 give the geographical coordinates of the PPE.

At the time of the PA reconnaissance (Ref. 48), Bellwood Branch had water in it and was flowing at a rate, visually judged during reconnaissance, to be less than 10 feet cubic feet per second (cfs). However, this PA classifies Bellwood Branch as an intermittent stream because no stream gauging stations are located on Bellwood Branch, and its average annual flow could not be substantiated (Refs. 35 and 39). Pursuant to Section 3.4 of the PA Guidance (and Section 4.0.2 of the HRS), intermittently flowing waters are not considered surface water bodies in areas that receive twenty or more inches of mean annual precipitation (Refs. 2 and 19).

4.1.2 Target Distance Limit (In-Water Segment)

The surface water TDL is the migration route that site generated run-off would follow from the point it enters a perennial surface water body (the PPE), to a point 15 miles downstream (Refs. 2, 19, and 20). Figure 4 is a Wetland Inventory Map showing the site location, the PPE, and the surface water TDL (Refs. 2 and 19). The surface water TDL includes parts of Proctor Creek and the Chattahoochee River (Figure 4). The surface water TDL continues from the PPE, along Proctor Creek, to the Chattahoochee River; the Chattahoochee River is approximately 6 miles downstream of the PPE (Figure 4). The surface water TDL continues a distance of approximately 9 miles on the Chattahoochee River below the confluence with Proctor Creek (Figure 4).

According to the USGS Water-Data Report for Water Years 2003-2005, the annual mean flow is 12.5 cfs for Proctor Creek at Hortense Way, at USGS Monitoring Station No. 02336517 (Ref. 39). According to the USGS National Water Information System, the average annual discharge between 1984 and 2006 was 1,486 cfs in 1988 for USGS gauging station 02336490, located on the Chattahoochee River at GA Highway 280 near Atlanta (Ref. 63).

4.2 Surface Water Targets

For the purposes of this PA, only surface water targets located within the surface water TDL are considered (Refs. 2 and 19). The surface water targets are sub-divided into the Drinking Water Threat, the Human Food Chain Threat, and the Environmental Threat as follows:

4.2.1 Drinking Water Threat

No surface water drinking water intakes exist within the 15-mile surface water TDL (Ref. 30). This PA did not positively confirm the beneficial use of surface water within the surface water TDL, for non-drinking water purposes. Regardless, Section 3.4.2 of the PA Guidance (Page 102) allows for the conservative assumption that surface water often has some beneficial use for purposes other than drinking water (Ref. 3).

4.2.2 Human Food Chain Threat:

The document entitled, *Guidance for Performing Preliminary Assessments Under CERCLA* (Ref. 20) gives the following definition of a fishery on Page 91:

An area of a surface water body from which food chain organisms are taken or could be taken for human consumption on a subsistence, sporting, or commercial basis. Food chain species include fish, shellfish, crustaceans, amphibians, and amphibious reptiles.

Page 91 of the PA Guidance (Ref. 20) also states:

The definition of a fishery is intentionally broad and is meant to include any portion of a body of water that does or could provide at least one trout, clam, lobster, frog, or alligator (to name one of each type of animal specified in the definition) for human consumption. In practice, then, water bodies that qualify as fisheries are extremely common.

According to the definition of a fishery given in the PA Guidance (Ref. 20), stated above, this PA considers the portions of Proctor Creek and the Chattahoochee River that are within the 15-Mile surface water TDL to be fisheries for the purposes of this PA, based on the following evidence:

- The U.S. Geological Survey (USGS), National Water Quality Assessment Program's 1995 publication, "What fish live in the streams of Metropolitan Atlanta?" lists the following fish as having been collected from Proctor Creek: the red shiner, the white sucker, the largemouth bass, the green sunfish, and the redbreast sunfish (Ref. 32).
- According to Chris Martin, a Georgia DNR, Region 3 Sr. Fisheries Biologist, people fish in the Chattahoochee River within the surface water TDL, and are likely to fish in Proctor Creek within the surface water TDL (Ref. 38).
- According to Gary Beisser, a Georgia DNR Northwest Region Fisheries Biologist, recreational fishing occurs on the Chattahoochee River within the surface water TDL (Ref. 21).
- The USGS Water-Resources Investigations Report 00-4139, entitled "Fecal-coliform bacteria concentrations in streams of the Chattahoochee River National Recreation Area, Metropolitan Atlanta, Georgia, May-October 1994 and 1995" designates the section of the Chattahoochee River within the surface water TDL (Figure 4) for fishing (Ref. 33).
- The document entitled, "Guidelines for Eating Fish from Georgia Waters, 2007 Update," published by the Georgia DNR, does not list a fish advisory for Proctor Creek (Ref. 61). However, the document lists a consumption guideline for the

Chattahoochee River within the surface water TDL for bluegill sunfish (1 meal per week) due to PCBs (Ref. 61). The guidelines recommend no restrictions on the consumption of channel catfish and white sucker (Ref. 62).

- Pursuant to Section 391-3-6-.03(14) of the Georgia Rules for Water Quality Control (Specific Water Use Classifications), both Proctor Creek and the Chattahoochee River are classified as "Fishing"; The fishing classification is scientifically determined to be the best utilization of the surface water bodies (Ref. 62).
- The U.S. EPA, National Assessment Database lists the Year 2002, 305(b) Water Quality Attainments for Proctor Creek (Ref. 34). They are as follows:
 - Designated Use Category: Aquatic Life Harvesting
 - State Designated Use: Fishing
 - Attainment Status: Not Attainable
 - Threatened: No
 - State Impairment: Total Fecal Coliform
 - EPA Impairment Classif.: Pathogens
 - State Source: Combined sewer overflows and urban runoff/urban effects
 - EPA Source Classif.: Sewage and urban-related runoff/stormwater

Accordingly, for the purposes of this PA, the entire surface water TDL is considered a fishery.

4.2.3 Environmental Threat:

Less than one mile of HRS-qualifying wetlands frontage occurs along Proctor Creek downstream of the PPE (Refs. 19 and 31). The nearest downstream HRS-qualifying wetland is located approximately 3.9 miles downstream of the PPE on Proctor Creek (Figure 4). There is a length of approximately 2,300 feet of HRS-qualifying wetlands frontage within the surface water TDL; all of the HRS-qualifying wetlands are all along Proctor Creek (Figure 4, Refs. 19 and 31). This PA does not suspect wetlands to have been exposed to a hazardous substance released from the site. Wetland frontage exists along the Chattahoochee River within the surface water TDL, but is not applicable for this PA because of the flow rate exceeds 100 cfs (Refs. 31 and 63).

The following aquatic species, designated as Threatened (T) or Endangered (E) in Georgia, are reported for Fulton County and/or the NW Atlanta Quadrangle (Refs. 36, 37, 43, and 48):

- *Elliptioarctata* (E), common name Delicate Spike; and
- *Cambarus howardi* (T), common name Chattahoochee Crayfish.

The following aquatic species, designated as Threatened (T) or Endangered (E) in the U.S., are reported for Fulton County and/or the NW Atlanta Quadrangle (Refs. 36, 37, 45, and 48):

- *Etheostoma scotti* (T), common name Cherokee Darter;
- *Hamiota subangulata* (E), common name Shinyrayed Pocketbook; and
- *Medionidus penicillatus* (E), common name Gulf Moccasinshell.

4.3 Surface Water Conclusions

Suspected Release to Surface Water:

For the purposes of this PA, the EPD suspects a release of a hazardous substance from the site to surface water based on the following:

- **The presence of nearby surface water:** The OROR is approximately 1,300 feet long, and follows a well-defined pathway along Bellwood Branch (Ref. 48).
- **The presence of a source in a flood zone:** The western portion of the site is within the 100-year flood plain boundary along Bellwood Branch (Attachment A4 of Ref. 48). Therefore, a source (site soils, assumed to be contaminated—See Section 2.3.3.2) is prone to periodic flooding.
- **Likely discharge of contaminated groundwater to surface water:** Based on analytical evidence of groundwater contamination (Hazardous Waste Permit No. HW-051(D), and groundwater monitoring reports); the discharge of groundwater from the northern portion of the site (including the polymer pond area) into Bellwood Branch according to the RFA; and a relatively short OROR [Surface drainage in Bellwood Branch flows from the northern portion of the site approximately 1,200 feet into Proctor Creek at the PPE (Photos 70-75, Attachment A2 and Attachment A3 of Ref. 48)] there is a likely discharge of contaminated groundwater to surface water (Refs. 7, 11, 18, 25, 51, and 58).
- **Circumstantial evidence of surface water contamination:** The 1987 RFA documents a minimum of 12 spill-type releases from April 1984 to November 1985 (Ref. 11). These included releases to the storm sewer that leads to Bellwood Creek (Ref. 11).

Mercury is among the constituents listed for the surface impoundments in the 1987 RFA (Table 2 of Ref. 11). This PA suspects Proctor Creek to be exposed to a hazardous substance released from the site because of its proximity and because of the high bioaccumulation value of mercury (Refs. 4, 11, and 48).

Suspected Target Fishery:

For the purposes of this PA, the EPD suspects that a release of a hazardous substance from the site to surface water has impacted surface water targets located within the surface water TDL. The EPD suspects exposure of a fishery to a hazardous substance released from the site based on the following rationale:

- **Presence of a nearby target fishery:** According to the definition of a fishery given in the PA Guidance (Ref. 20), stated in Section 4.2.2, this PA considers the portions of Proctor Creek and the Chattahoochee River that are within the 15-Mile surface water TDL to be fisheries for the purposes of this PA, based on the following criteria:
 - The identification of game fish in Proctor Creek in a USGS Water Quality Assessment and USGS designation of the Chattahoochee River within the surface water TDL for fishing (Refs. 32 and 33);
 - DNR Fisheries biologists' identification of the Chattahoochee River as a fishery and Proctor Creek as a likely fishery (Refs. 21 and 38);
 - The existence of DNR Fish Consumption Guidelines for the Chattahoochee River within the surface water TDL (Ref. 61); and
 - A state-designated use of "fishing" listed for Proctor Creek in the EPA National Assessment Database (Ref. 34).
- **Circumstantial evidence:** Mercury is among the constituents listed for the surface impoundments in the 1987 RFA; this PA suspects a release of a hazardous substance to the Surface Water Pathway to have affected Proctor Creek based on the high bioaccumulation value of mercury (Ref. 4, and Table 2 of Ref. 11).

In conclusion:

- The Drinking Water Threat by itself does not warrant further evaluation under the HRS at this time because there is no known drinking water intake located within the surface water TDL (Ref. 30).
- The Human Food Chain Threat by itself warrants further evaluation under the HRS. Although the human consumption of food chain organisms obtained from the surface water TDL was not positively confirmed as part of this PA, further evaluation is warranted due to a relatively large waste quantity, a suspected release of a hazardous substance from the site to the Proctor Creek section of the surface water TDL and the

broad definition of "Fishery" set forth on Page 91 of the PA Guidance (Refs. 7, 11, 18, 20, 21, and 32-35).

- The Environmental Threat by itself does not warrant further evaluation under the HRS. Despite a relatively large waste quantity, a suspected release of a hazardous substance from the site to the Proctor Creek Section of the surface water TDL, and state and federal endangered and threatened species habitats within the surface water TDL, only 2,300 feet of qualifying wetland frontage exists (Refs. 31, 36, 37, and 41-47).

5.0 SOIL EXPOSURE AND AIR PATHWAYS

5.1 Physical Conditions

Surface soil at the site consists of silty, fine micaceous sand with occasional traces of clay (Ref. 58). This PA assumes the presence of surficial soil contamination throughout the site for the purposes of this PA (See PA Section 2.3.3.2).

The 2004 Draft Part B Permit Renewal Application submittal describes the surface impoundment caps as containing six feet of clay having a soil permeability less than 2.97×10^{-7} cm/sec (Ref. 25). However, the EPD has not been able to verify that the surface impoundment caps completely cover the impoundments and are intact (Ref. 48). A sinkhole exists on the eastern side of the Series Pond Area cap (Photo 41 of Ref. 48); this is evidence of the poor condition of the Series Pond Area cap. A recent (October 11, 2007) EPD trip report contains evidence of poor condition and uncertain boundaries for the RCRA caps at the Polymer Pond and Series Pond Area (Ref. 6). The approximate boundaries of the RCRA cap on the Series Pond Area, as determined from the ditch surrounding the cap, does not extend to the edges of the surface impoundment indicated on maps from the AZS 1987 RFA (Attachments A6 and A7 of Ref. 48). A third, filled, pre-RCRA surface impoundment existed west of the Series Pond Area beyond the estimated extent of the Series Pond Area RCRA cap (Attachment A7 of Ref. 48).

5.2 Soil and Air Targets

During PA field reconnaissance (Ref. 48), the outer gate on Marietta Blvd. and the main gate on the eastern site fence were unlabelled and had footpaths leading around them (Photos 1-6 of Ref. 48). The fence surrounding the site also had several openings (Ref. 48). During field reconnaissance, the field team members saw four people passing through the outer gate on Marietta Blvd. (Photos 4 and 5 of Ref. 48).

During field reconnaissance, the team identified 15 separate areas (9 located within the site fence) that contained evidence of human habitation including: food, food packaging, grills, shopping carts, fire rings, a burning fire attended by a man, tents, shacks, tarps, clotheslines, sleeping bags, blankets, chairs, stools, toilet paper with feces on the ground, coolers, and a flock of chickens (Ref. 48). It is clear from the evidence that indigents occupy these areas (Ref. 48). Attachment A1 of Ref. 48 shows the locations of the indigent camps, numbered Camps 1-15. Attachment B of Ref. 48 contains annotated photographs documenting Camps 1-15. The following photographs in Ref. 48 show individual camps: 9, 10, 13, 14, 20, 22-31, 35, 42, 44, 52-63, 69, 82, and 83. The photograph captions identify the features at the individual camps (Ref. 48).

Personnel of the HWMB have directed the facility to take immediate corrective actions to abate conditions that posed a direct threat to human health and the environment, and to provide documentation of the completion of the actions to the EPD (Refs. 64 and 65). However, the facility still has not corrected these conditions (Refs. 64 and 65). On

December 19 and 21, 2007 HWMB personnel performed interim RCRA compliance status checks at the site (Refs. 64 and 65). The HWMB compliance officer observed that the facility was still occupied by indigents camping on the site, and the recovery wells still had accessible spigots connected to them (Ref. 64). The compliance officer concluded in the trip reports that conditions at the site continue to pose a direct threat to human health and the environment (Refs. 64 and 65).

There are indigent encampments on the site property that are on or within 200 feet of the following sources or probable sources: the Polymer Pond, the Series Pond Area, drums identified during PA reconnaissance, and site soils (Refs. 17 and 48). A footpath used by indigents is located on top of the Series Pond Area cap (Photo 40 of Ref. 48). Indigent Camp #6 (Photo 35 of Ref. 48) is located in an area, based on maps from the AZS 1987 RFA (Ref. 11, excerpted maps included as Attachments A6 and A7 of Ref. 48), which is over the Series Pond Area. Based on a total of 9 indigent camps located on the site property and either on or within 200 feet of a source (Ref. 48), and an average household population of 2.3 listed for the City of Atlanta in the 2000 U.S. Census (Ref. 40), there is an estimated resident population of 21. Because there is evidence that these indigents cook, eat, and sleep on the ground, they are likely to be exposed to site soils (Ref. 48).

U.S. Census data from the year, 2000 identify the following population within 4 miles of the site, starting at the Site Reference Point (Ref. 24):

Radius Ring (miles)	Population
0.25	1315
0.5	2895
1	8023
2	31541
3	64520
4	78329

The grounds of the Atlanta City Jail are located approximately 400 feet northeast of the site boundary (Refs. 24 and 48). The census tract containing the jail lists 2 households (There are two large building at the jail.) and 2,679 residents, who this PA surmises are inmates (Ref. 24).

Reconnaissance for this PA did not identify any terrestrial sensitive environments on site or on a source (Ref. 48). However, for consideration in the Air Pathway, State, and Federal listed terrestrial species for the NW Atlanta Quadrangle (Ref. 36) and Fulton County (Ref. 37) are assumed to exist on the site, per Page 133 of the PA Guidance (Ref. 20). State and Federal listed aquatic species are assumed to exist within ¼ mile because the PPE is not onsite, but it is within ¼ mile of the site (Refs. 20 and 48). All wetlands located within a ½ mile radius of the site have unconsolidated bottoms; per Highlight A-8 of the HRS Guidance manual, wetlands with unconsolidated bottoms are not HRS-eligible (Refs. 19 and 31).

The following aquatic species, designated as Threatened (T) or Endangered (E) in Georgia, are reported for Fulton County and/or the NW Atlanta Quadrangle (Refs. 36, 37, 43, and 48):

- *Elliptioarctata* (E), common name Delicate Spike; and
- *Cambarus howardi* (T), common name Chattahoochee Crayfish.

The following aquatic species, designated as Threatened (T) or Endangered (E) in the U.S., are reported for Fulton County and/or the NW Atlanta Quadrangle (Refs. 36, 37, 45, and 48):

- *Etheostoma scotti* (T), common name Cherokee Darter;
- *Hamiota subangulata* (E), common name Shinyrayed Pocketbook; and
- *Medionidus penicillatus* (E), common name Gulf Moccasinshell.

The following terrestrial species, designated as Threatened (T) or Endangered (E) in Georgia, are reported for Fulton County and/or the NW Atlanta Quadrangle (Refs. 36, 37, 43, and 48):

- *Fothergilla major* (T), common name Mountain Witch-alder; and
- *Schisandra glabra* (T), common name Bay Star-vine.

The following terrestrial species, designated as Threatened (T) or Endangered (E) in the U.S., are reported for Fulton County and/or the NW Atlanta Quadrangle (Refs. 36, 37, 45, and 48):

- *Symphotrichum georgianum* (C), common name Georgia Aster.

As part of this PA, land use for the purposes of commercial agriculture, commercial silviculture or commercial livestock production (or grazing) was not positively confirmed to currently occur on an area of suspected contamination associated with the site, or within one-half (½) mile of any on-site potential source. Regardless, Section 3.5.2 of the PA Guidance (Page 123) allows for the conservative assumption that at least one of the before-mentioned land use categories occurs on an area of suspected contamination associated with the site, and Section 3.6.2 of the PA Guidance (Page 140) allows for the conservative assumption that at least one of the before-mentioned land use categories occurs within ½ mile of an on-site source (Ref. 20).

5.3 Soil Exposure and Air Pathway Conclusions

In conclusion, the Soil Exposure Pathway by itself warrants further evaluation under the HRS, based on the following evidence:

- **Suspected contamination:** This PA assumes the presence of surficial soil contamination throughout the site for the purposes of this PA (See PA Section 2.3.3.2). Additionally, Section 3.5.1 of the PA Guidance (page 111) allows for the conservative assumption that hazardous substances are present on a site in areas not covered by an essentially impenetrable cover; or more than 2 feet of cover material (Ref. 20).
- **An indigent population living on the site:** Based on a total of 9 indigent camps located on the site property and either on or within 200 feet of a source (Ref. 48), and an average household population of 2.3 listed for the City of Atlanta in the 2000 U.S. Census (Ref. 40), there is an estimated population of 21 living on the site. Because there is evidence that these indigents cook, eat, and sleep on the ground, they are likely to be exposed to contaminated site soils (Ref. 48).
- **The presence of a large population within 1 mile:** The 2000 U.S. Census documents a population of 12,234 within 1 mile (Ref. 24). The grounds of the Atlanta City Jail are located approximately 400 feet northeast of the site boundary, the jail accounts for 2,679 residents (Refs. 24 and 48).

Despite a population of 185,554 living on and within 4 miles of the site (Refs. 6, 40, and 48), the Air Pathway by itself does not warrant further evaluation under the HRS, because of the lack of direct observations, reports of adverse health effects, analyses, or circumstances warranting a suspected release to the air (Ref. 48). Additionally, there are no HRS-eligible wetlands or field-identified and confirmed sensitive environments at or near the site (Refs. 19, 31, and 48).

6.0 SUMMARY AND CONCLUSIONS

The Groundwater Pathway by itself warrants further evaluation under the HRS at this time, based on the presence of a suspected release (See Section 3.3), and the presence of an estimated indigent population of 35 suspected to be drinking contaminated water from active spigots at the wellheads of three on-site recovery wells (Refs. 40 and 48).

The surface water pathway, human food chain threat by itself warrants further evaluation under the HRS at this time, based on a suspected release to surface water (nearby surface water, presence of a source in a flood zone, likely discharge of contaminated groundwater to surface water, and circumstantial evidence of surface water contamination); and the presence of a nearby fishery in Proctor Creek suspected to have been exposed to a hazardous substance released from the site (Refs. 20, 32-34, 38, and 61).

The Soil Exposure Pathway by itself warrants further evaluation under the HRS at this time, based on suspected contamination (Section 2.3.3.2 and Ref. 20); the presence of an estimated indigent resident population of 21 (Refs. 40 and 48); and the presence of 12,234 people living within 1 mile (Refs. 24 and 48).

The Air Pathway by itself does not warrant further evaluation under the HRS at this time, because of the lack of a suspected release to the air (Ref. 48), and lack of HRS-eligible wetlands or field-identified and confirmed sensitive environments at or near the site (Refs. 19, 31, and 48).

In conclusion, the Groundwater, Surface Water, and Soil Pathways, each by themselves, warrant further evaluation under the HRS at this time. Therefore, based on available information and current site conditions, the EPD recommends the site for further evaluation under the HRS.

Should the indigent population be removed from the site, the Groundwater and Soil Exposure Pathways by themselves would no longer warrant further evaluation under the HRS. However, the Surface Water Pathway by itself would continue to warrant further evaluation under the HRS.

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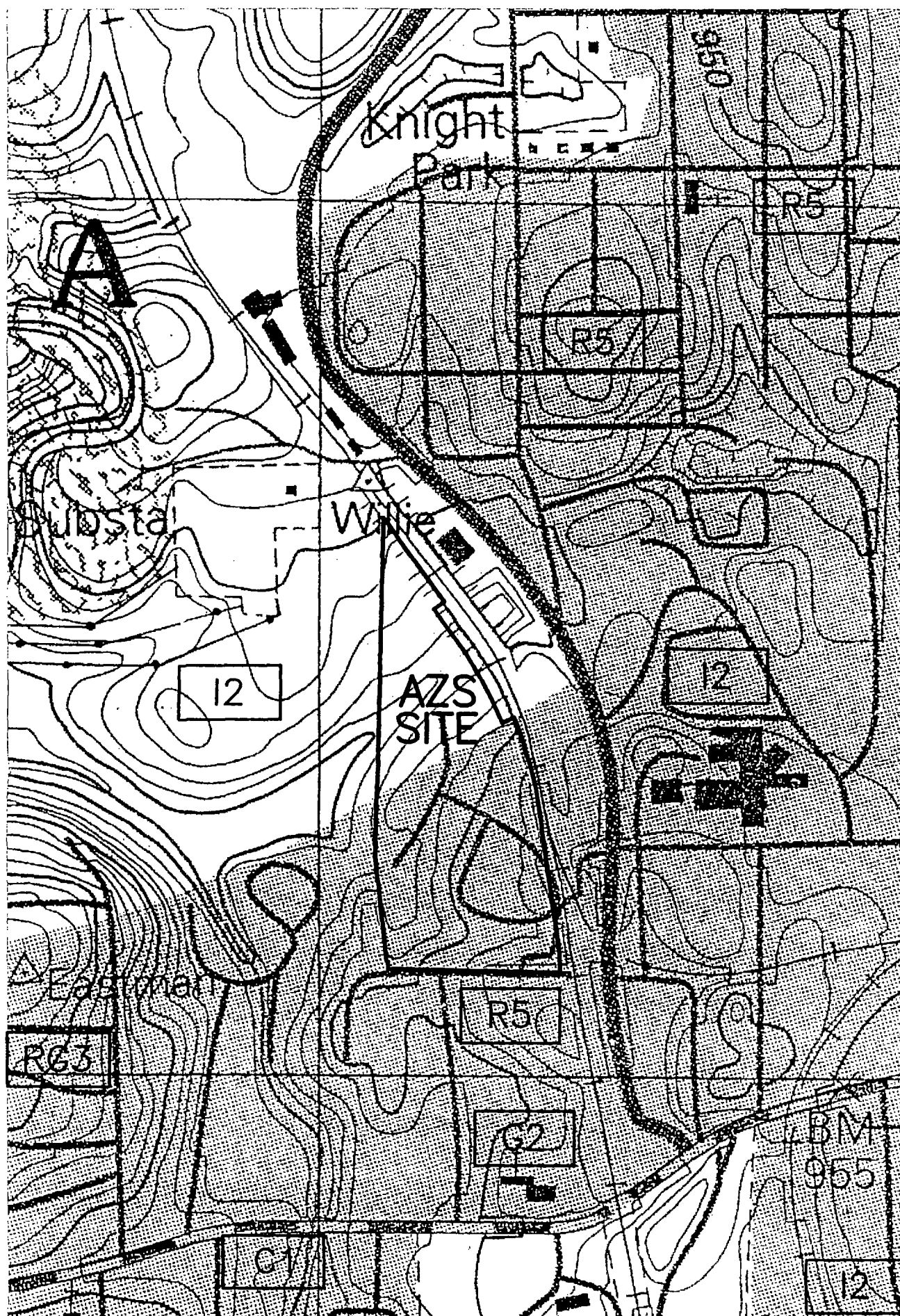
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FIGURES

LEGEND

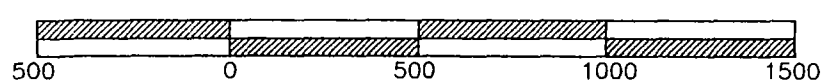
I2	INDUSTRIAL
I1	INDUSTRIAL
C1	COMMERCIAL
RG3	RESIDENTIAL GOVERNMENT
RG5	RESIDENTIAL GOVERNMENT
G2	GOVERNMENT



AREA TOPOGRAPHIC MAP (10 FOOT CONTOURS)

AZS

HW-051D
762 MARIETTA BOULEVARD
ATLANTA, GEORGIA 30318



SCALE: 1" = 500'

SITE LOCATION MAP

PA FIGURE 1.
(FROM REF. 25)

U.S. EPA REGION IV

SDMS

Unscannable Material Target Sheet

DocID: 10697157

Site ID: GAD

Site Name: A & S Chemical Co.

Nature of Material:

Map: ☒

Computer Disks: ☐

Photos: ☐

CD-ROM: ☐

Blueprints: ☐

Oversized Report: ☐

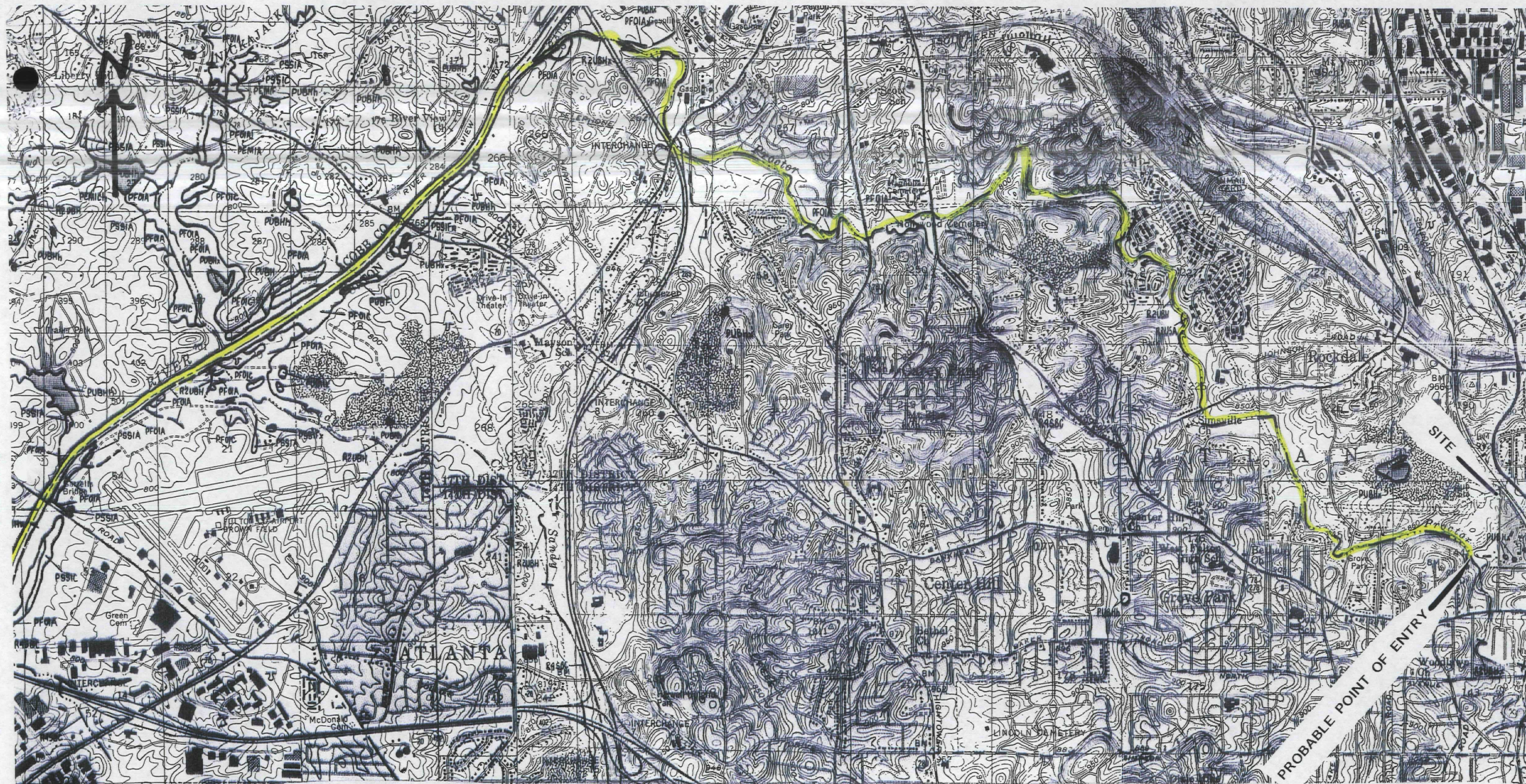
Slides: ☐

Log Book: ☐


Other (describe): Site Topographic Map (Fig. 2)

Amount of material: _____

* Please contact the appropriate Records Center to view the material *



LEGEND

 SURFACE WATER
PATHWAY

SCALE 1:24,000

PA FIGURE 4.
WETLAND INVENTORY MAP
SHOWING SURFACE WATER PATHWAY
(REF. 31)



APPENDICES

Appendix A

Trip Report, Preliminary Assessment (PA) Site Reconnaissance on November 29, 2007

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Drive, SE, Suite 1154, Atlanta, Georgia 30334
Noel Holcomb, Commissioner
Environmental Protection Division
Carol A. Couch, Ph.D., Director
404/656-2833


January 7, 2008

TRIP REPORT

SITE NAME & LOCATION:

AZS Chemical Company (a.k.a. Cargill)
762 Marietta Blvd. N.W.
Atlanta, Georgia 30318
EPA ID Nos. GAD981237225 &
GAD057288144

TRIP BY:

Lawrence Papetti 
Geologist 3
Hazardous Waste Management Branch
PA/SI Subunit

ACCOMPANIED BY:

Luis E. Medina
Environmental Specialist 3
Hazardous Waste Management Branch
PA/SI Subunit

Thomas J. Brodell, QEP
Compliance Officer
Hazardous Waste Management Branch
Land Disposal Unit

DATE OF TRIP:

November 29, 2007

OFFICIALS CONTACTED:

None

REFERENCE:

Preliminary Assessment (PA) site
reconnaissance

PURPOSE:

EPD Hazardous Waste Management Branch (HWMB) personnel conducted on-site and off-site reconnaissance for the AZS Chemical Company on November 29, 2007. The purpose of the site reconnaissance was to collect certain information necessary to complete a Preliminary Assessment (PA) in accordance with the document titled: *Guidance for Performing Preliminary Assessments Under CERCLA*, United States Environmental Protection Agency, Office of Emergency and Remedial Response, Washington, DC 20460, EPA/540/G-91/013, September 1991.

COMMENTS:

The following comments serve to document areas visited, interviews conducted and observations noted during the November 29, 2007 Site Reconnaissance:

1. During the site reconnaissance, Mr. Papetti recorded pertinent observations on maps (Attachment A contains field-annotated maps.), with photographs (Attachment B contains a photograph log and 83 photographs), and in the logbook (Attachment C contains copies of the logbook).
2. The reconnaissance team reviewed, discussed, and signed a Site Health and Safety Plan (HASP) that addressed the hazards associated with field reconnaissance activities (Attachment E).
3. Based on measurements from the AZS facility boundaries as marked on Attachment A2, the site area is approximately 14 acres (595,000 square feet). The site boundaries converge to a point on the north end of the site (Photos 76-78 and Attachment A1). The site is bounded on the north and northwest by a cleared power transmission line corridor and a large power substation (Photo 77 and Attachment A2). The site is bounded on northwest and west by a wooded area (Photos 76-78). A cleared, aboveground power transmission line corridor crosses the southern portion of the site in an east-west direction. There is an open, brushy area west of the site underneath the power transmission lines. Loveless Avenue, an abandoned street, runs in an east-west direction immediately south of the southern fence line (Photo 52). The site is bounded on the southwest by a parking lot to an adjacent facility and on the southeast by woods (Photo 52). A railroad track borders the facility to the east (Photo 78).
4. During field reconnaissance, the team identified 15 separate areas (9 located within the facility fence) that contained evidence of human habitation including: food, food packaging, grills, shopping carts, fire rings, a burning fire attended by a man, tents, shacks, tarps, clotheslines, sleeping bags, blankets, chairs, stools, toilet paper with feces on the ground, coolers, and a flock of chickens. It is clear from the evidence that indigents occupy these areas. Because there is evidence that these indigents cook, eat and sleep on the ground, they are likely to come in contact with site soils. Attachment A1 shows the locations of the indigent camps, numbered Camp 1-Camp 15, on a facility map. Attachment B contains annotated photographs documenting Camps 1-15. The following photographs show individual camps: 9, 10, 13, 14, 20, 22-31, 35, 42, 44, 52-63, 69, 82, and 83. The photograph captions identify the features at the individual camps.
5. During field reconnaissance, the team identified 4 water spigots connected to the groundwater treatment system at the Series Pond (Photos 63-66). Three of the spigots were located at the wellheads of recovery wells RW-2, RW-3, and RW-4. One spigot was located at the remediation system shed. Attachment A1 identifies the well and remediation system

shed locations. The spigots at RW-4 and the remediation system shed produced water when turned on. Although the circuit boxes for RW-2 and RW-3 were energized, the breakers had been tripped and the wells were not pumping at the time. The area around well RW-4 was trampled, and the well was a few feet from a footpath between indigent camps. The spigots were accessible and unlocked. This evidence suggests that indigents may be using the spigots connected to the groundwater remediation system as a domestic water supply.

6. Sources and potential sources identified during field reconnaissance include the filled Polymer Pond (a surface impoundment) located on the northeastern portion of the site (Photos 17-19), the filled Series Pond (a surface impoundment) located on the southwestern portion of the site (Photos 40-43, and 47-51), a filled pre-RCRA process pond (a surface impoundment) on the southwest portion of the site, 8 drums with unknown contents located in different areas of the facility (Photos 12, 32-34, 36-38, and 81), and site soils. Attachment A1 shows the locations of the surface impoundments. The photographic log and individual photographs show the drums, and their geographic coordinates. A separate Land Disposal Unit trip report addressing RCRA concerns provides additional information on the drums.
7. The field team determined the coordinates of the Site Reference Point. The Photographic Log and the caption for Photo 16 in Attachment B give the latitude and longitude measured for the Site Reference Point. The Site Reference Point location is shown on Attachment A3. Photo 16 shows the actual Site Reference Point location on the ground.
8. Attachment A1 is a topographic map showing site topography at a 2-foot contour interval. Attachment A2 is an enlarged copy of the Northwest Atlanta USGS 7.5 minute topographic quadrangle map showing the Overland Run-Off Route (OROR) relative to the site and its sources. Attachment A3 is an aerial photograph showing the OROR. Attachment A5 is a Wetland Inventory Map showing the PPE and the Surface Water Pathway to the 15-mile Target Distance Limit (TDL). Attachments A2 and A3 show the Probable Point of Entry (PPE) of runoff from the site sources to surface water. Surface drainage from the Polymer Pond flows northward, through a swale, a distance of approximately 130 feet to Bellwood Branch (Photos 19 and 21), and continues downstream on Bellwood Branch a distance of approximately 1,200 feet to the PPE on Proctor Creek (Photos 70-75). Surface drainage from the Series Pond and the pre-RCRA pond flows through a ditch a distance of approximately 700 feet to Bellwood Branch (Photo 43), where it continues a distance of approximately 300 feet to the PPE (Photos 73-75). Surface drainage from all points of the site flows to Bellwood Branch and continues to Proctor Creek. Bellwood Branch enters the site from a culvert underneath the railroad tracks along the eastern site boundary on the northeastern portion of the site (Attachment A1), and flows across the site toward the southwest, exiting the site along the western-central site boundary. At the time of the reconnaissance, Bellwood Branch had water in it and was flowing at a rate estimated to be less than 10 feet cubic feet per second (cfs). Attachment A1, which is a topographic map with a 2-foot contour interval, identifies the pathways that runoff from individual site areas would follow. Photos 73-75 show the PPE at the confluence of Bellwood Branch and Proctor Creek. The Photographic Log and photograph caption for Photo 73 give the geographical coordinates of the PPE.

9. Based on a floodplain map (Attachment A4), the western portion of the site is within the 100-year flood plain boundary along Bellwood Branch.
10. The outer gate on Marietta Blvd. and the main gate on the eastern facility fence were unlabelled and had footpaths leading around them (Photos 1-6). During field reconnaissance, the field team members saw 4 people passing through the outer gate on Marietta Blvd. (Photos 4 and 5).
11. A sinkhole exists on the eastern side of the Series Pond cap (Photo 41); this is evidence of the poor condition of the cap.
12. The EPD has not been able to verify that the surface impoundments are completely covered by at least a 2-foot thickness of cover material. A recent (October 11, 2007) trip report for the AZS facility for a RCRA inspection conducted by EPD Land Disposal Unit personnel contains evidence of poor condition and uncertain boundaries for the RCRA caps at the Polymer Pond and Series Pond. The approximate boundaries of the RCRA cap on the Series Pond, as determined from the ditch surrounding the cap, does not extend to the edges of the surface impoundment indicated on maps from the AZS 1987 RFA (Attachments A6 and A7). A third, filled, pre-RCRA surface impoundment (Attachment A7) existed west of the Series Pond beyond the extent of the Series Pond RCRA cap.
13. A footpath used by indigents is located on top of the Series Pond cap (Photo 40).
14. Camp #6 (Photo 35) is located in an area, based on maps from the AZS 1987 RFA (Attachments A6 and A7), which is over the filled Series Pond.
15. A large tarp, covering unknown items, is located on the western portion of the site (Photo 68). The field team did not pull back the tarp because of its proximity to Camp #5. For safety and privacy reasons (See HASP in Attachment E), the field team attempted to minimize contact with the indigents living on the site.
16. There is a benchmark monument on the southwestern portion of the site (Photo 67 and Attachment A1). The coordinates and elevation recorded on the benchmark monument are listed in the caption of Photo 67.

RECOMMENDATIONS & FOLLOW-UP REQUIRED:

Use the information documented herein to complete a PA report (in conjunction with additional information). Results of the PA report will be used to determine whether further evaluation of the site under the Hazard Ranking System (HRS) is warranted at this time.

ATTACHMENTS:

- A: Field-annotated maps
- B: Photographic Log with 83 Photographs
- C: Logbook Documentation
- D: Site Health and Safety Plan

REVEIWED BY: ANDREW S. TAFT
Name (printed)

Environmental Specialist
Title

Andrew S. Taft
Signature

1/7/2008
Date

ATTACHMENT A
Field-annotated maps

U.S. EPA REGION IV

SDMS

Unscannable Material Target Sheet

DocID: 10697157

Site ID: GAD057288144

Site Name: A & S Chemical Co.

Nature of Material:

Map:



Computer Disks:



Photos:



CD-ROM:



Blueprints:



Oversized Report:



Slides:



Log Book:



Other (describe):

Topographic Site Map (fig. 4)

Amount of material:

* Please contact the appropriate Records Center to view the material *

LEGEND

From: R & 25

I2	INDUSTRIAL
I1	INDUSTRIAL
C1	COMMERCIAL
RG3	RESIDENTIAL GOVERNMENT
RG5	RESIDENTIAL GOVERNMENT
G2	GOVERNMENT

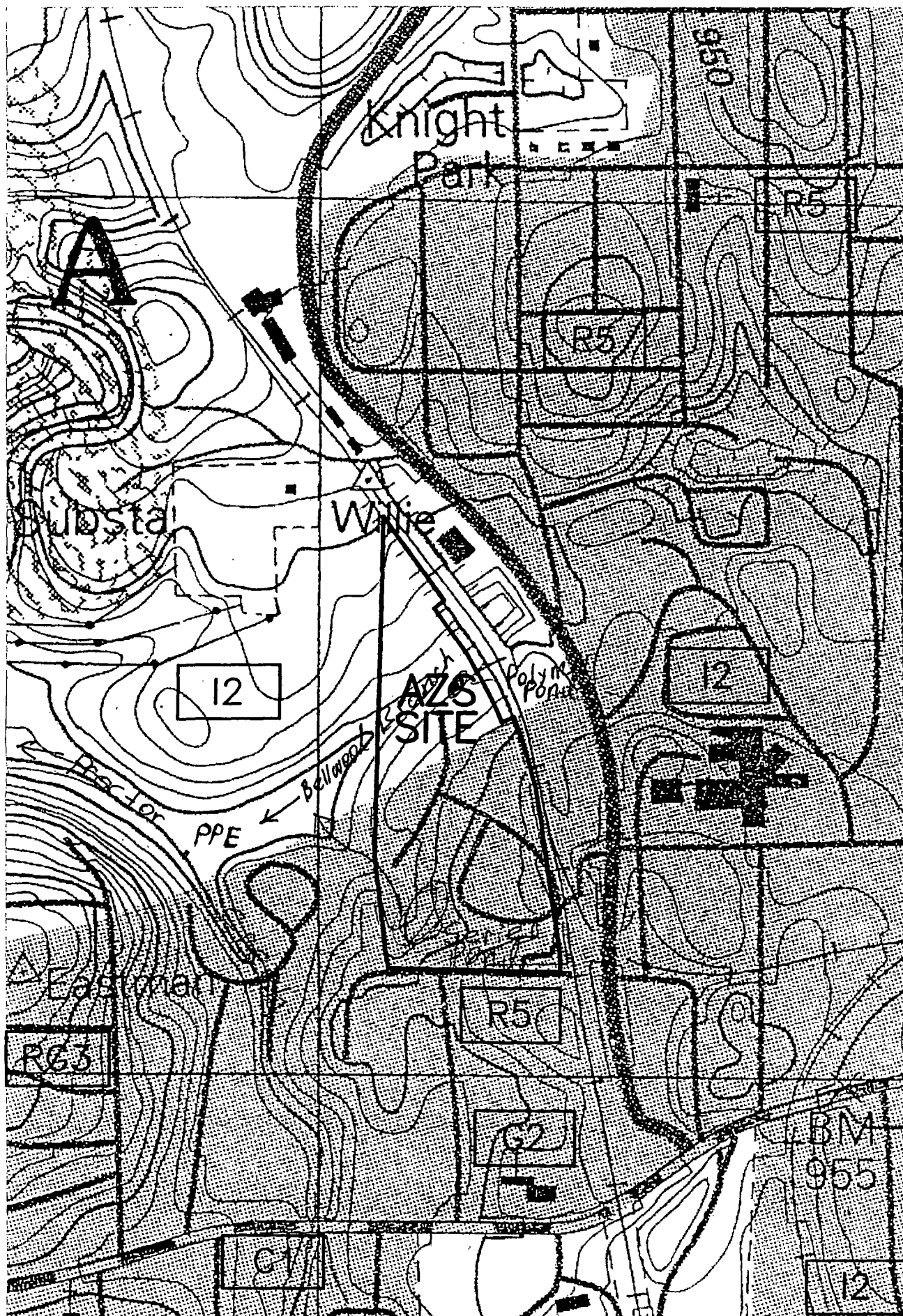
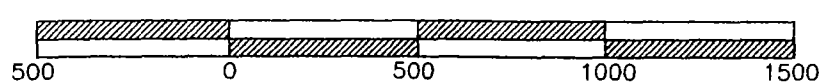


FIGURE 3
AREA TOPOGRAPHIC MAP
(10 FOOT CONTOURS)

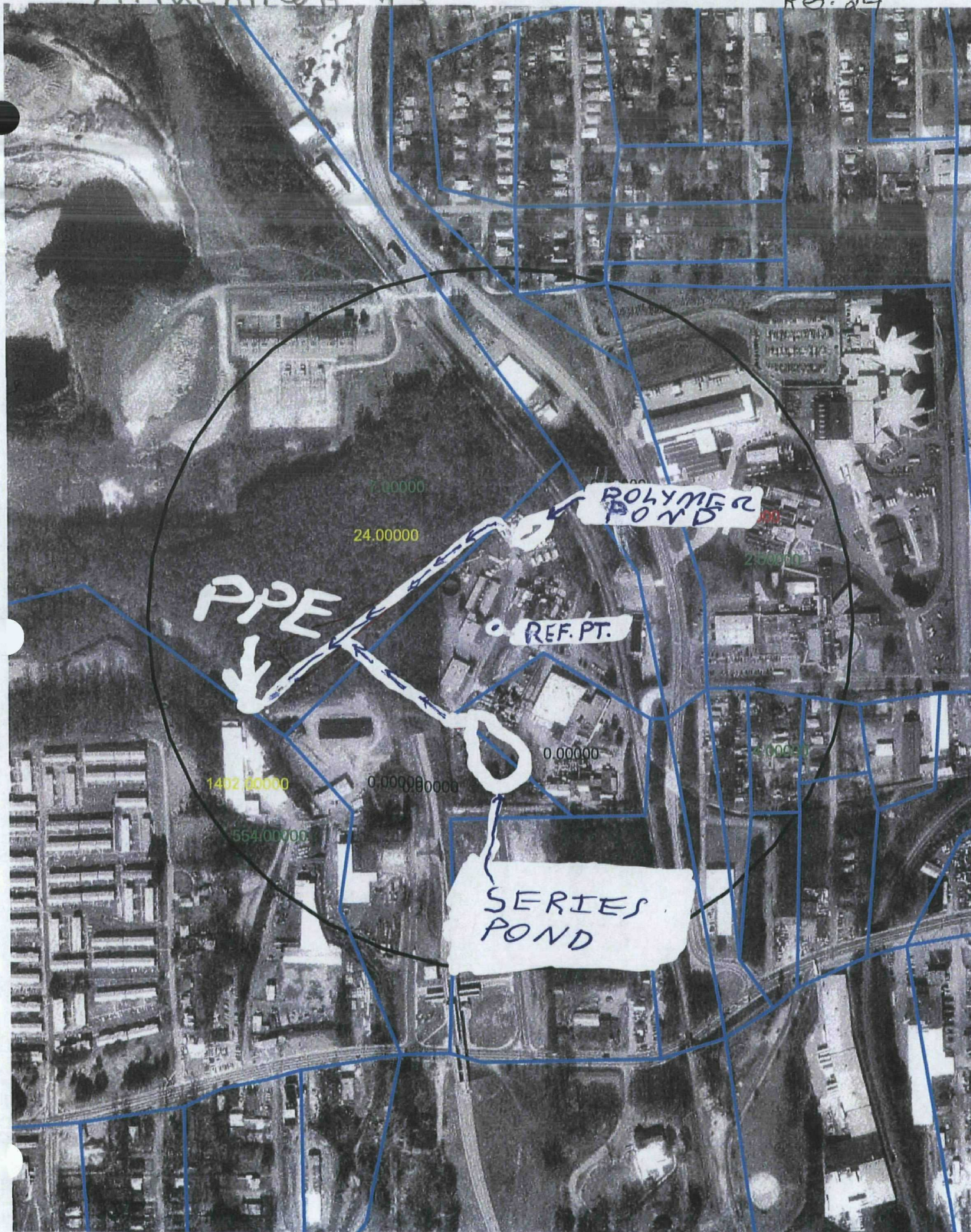
AZS

HW-051D
762 MARIETTA BOULEVARD
ATLANTA, GEORGIA 30318



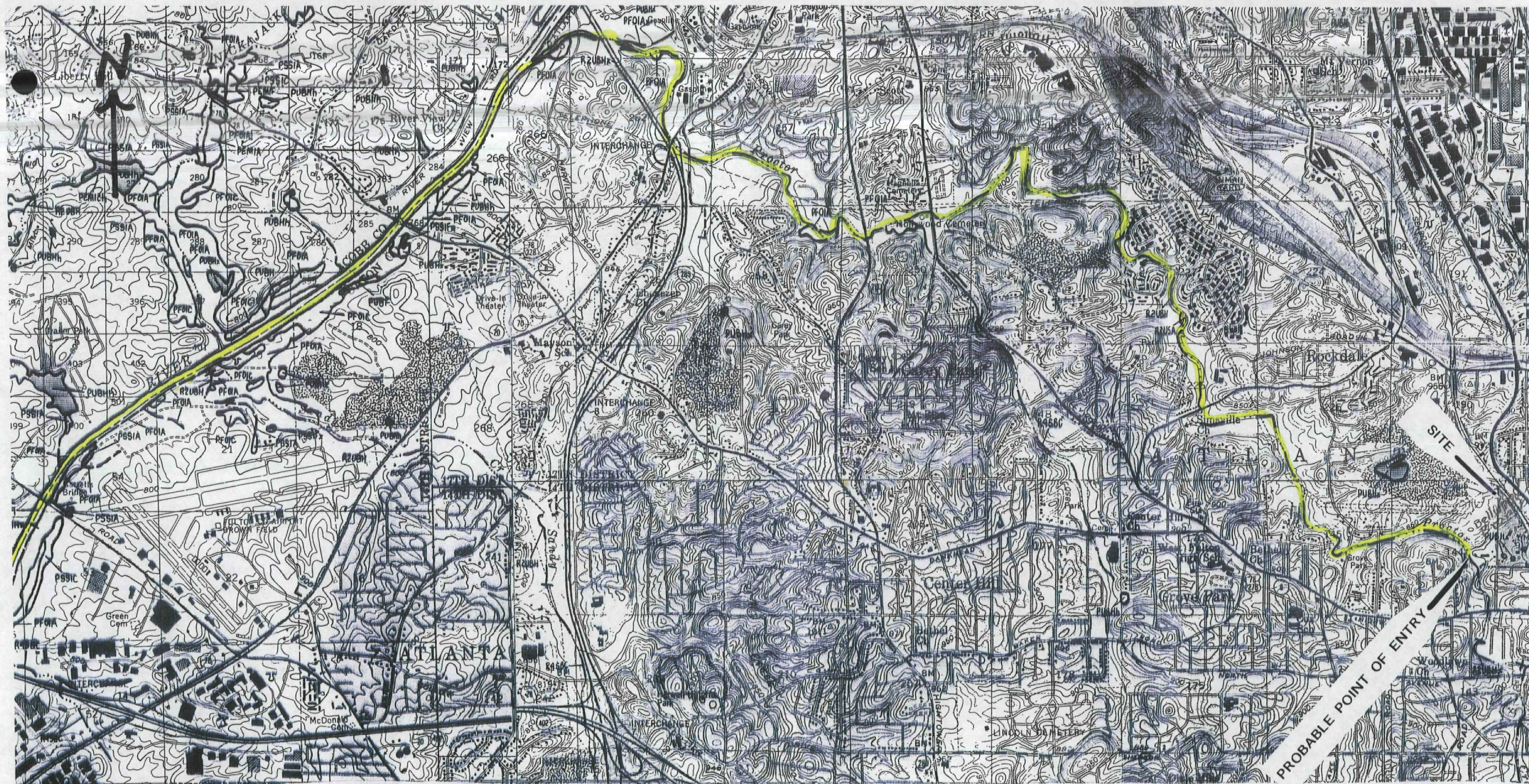
SCALE: 1" = 500'

Attachment A₂



Upper number = Population Per 2000 Census tract
Lower number = # households Per 2000 Census tract

NOTE: Tract containing
a population of 2677
contains a jail.



LEGEND

SURFACE WATER
PATHWAY

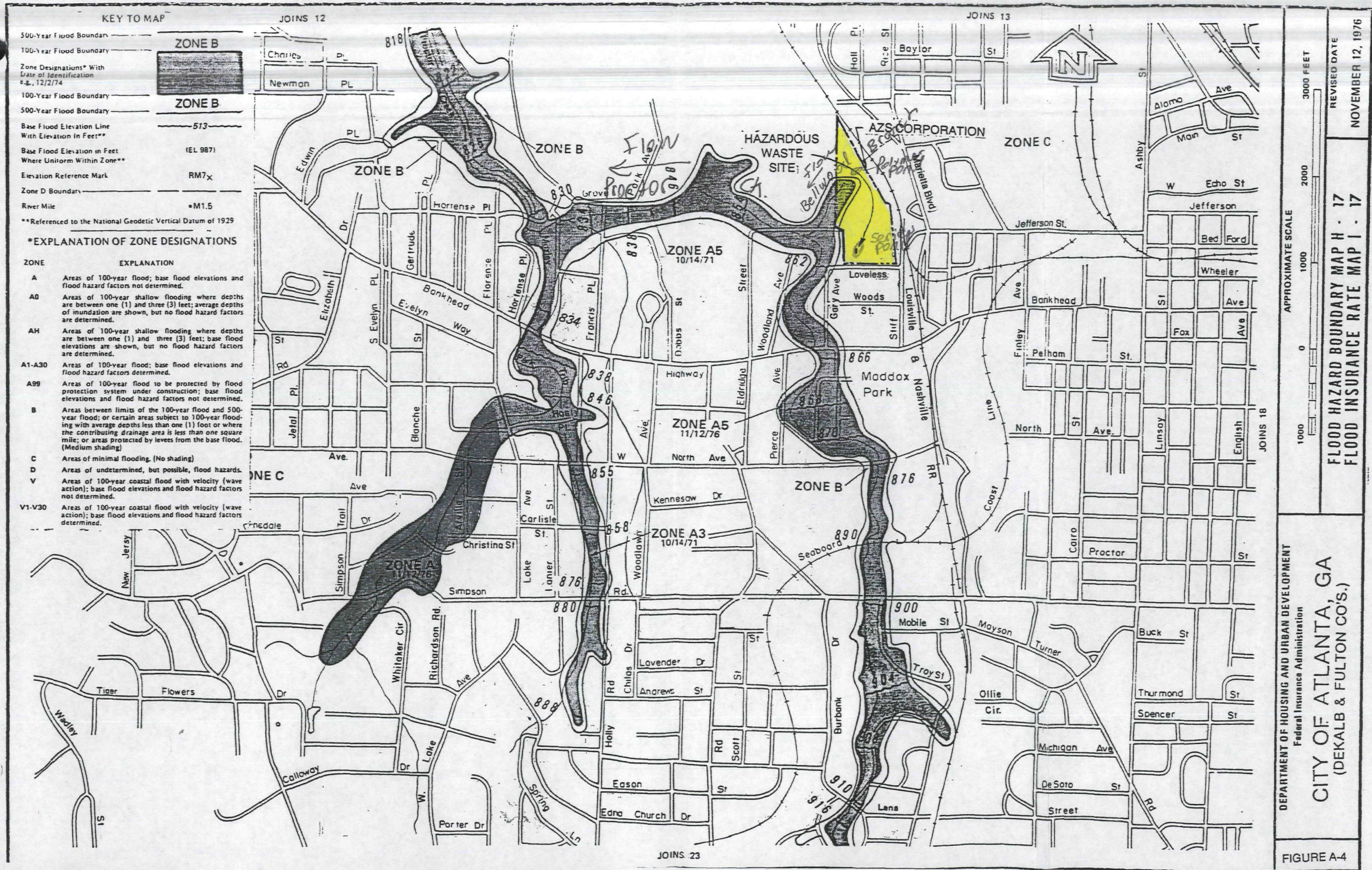
SCALE 1:24,000

FIGURE WETLANDS MA
SHOWING SURFACE WATER PATHWAY

(REF. 31)

Attachment A5

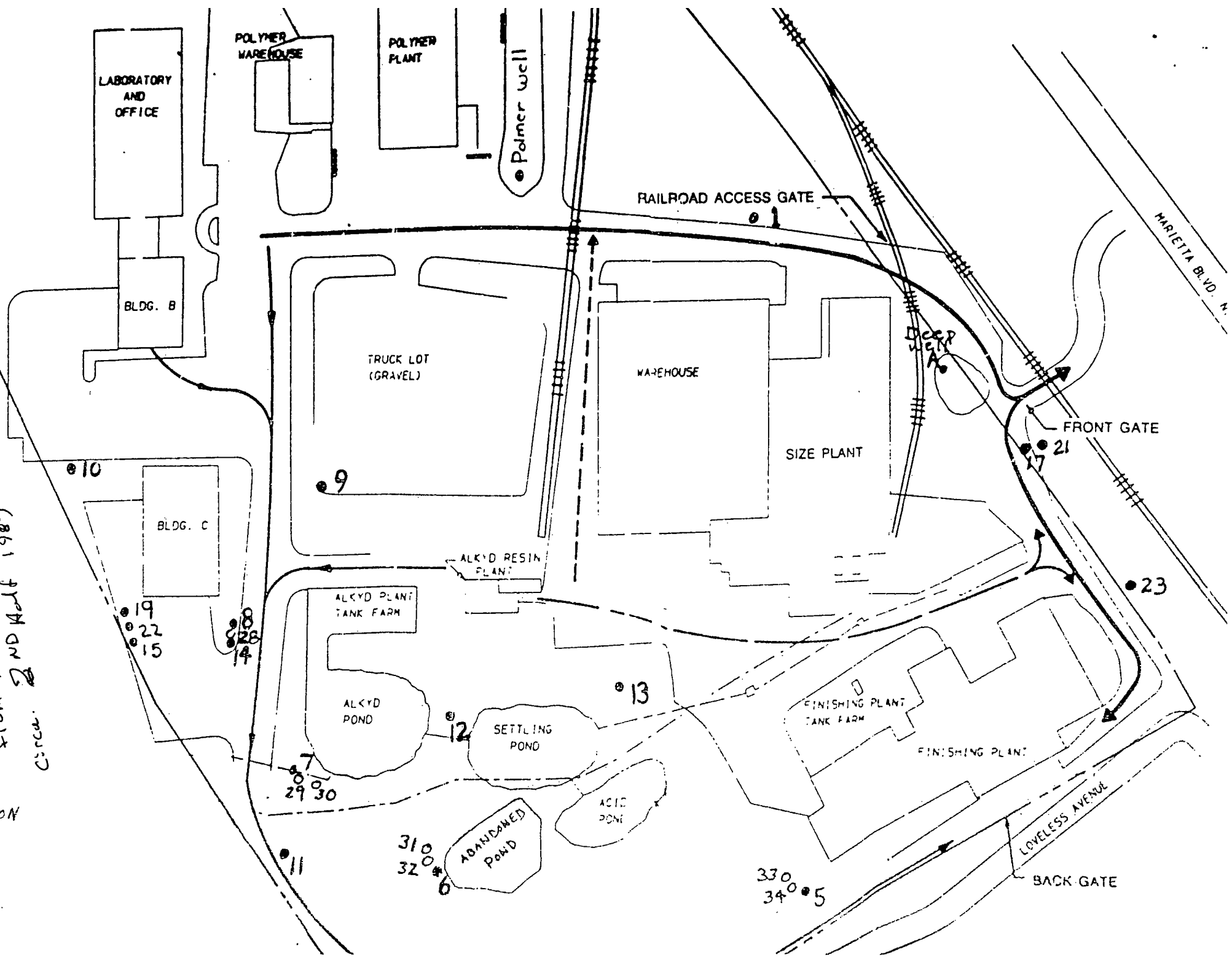




Attachment A₆

from AZS RFA
2nd half 1987
Circle

LOCATION



Attachment A7



MW-6

285

286

OLD ABAND

287

288

2873

ACID POND

289

290

291



MW-5

292

293

Attachment
#7

940.5

100.5

100.0

101.0

949.4

0.0

0.0

AZS CORPORATION ATLANTA, GEORGIA Closure Site Plans SERIES PONDS (South)	
The Chester Engineers <small>Engineers Architects Planners</small>	
SCALE: 1" = 30'	DWG. NO. 3457-01
NOVEMBER 1985	

ATTACHMENT B
Photographic Log with 83 Photographs

Photographic Log

Case Identifier: AZS CHEMICAL CO.
 EPA ID: GAD981237225/GAD057288144
 Location: 762 Marietta Blvd. NW, Atlanta, Fulton County, Georgia
 Photographer: Lawrence Papetti

Camera: Pentax
 Model: Optio W20
 S/N: 9314697

Photo Number	File Name	Date and Time	Orientation / Bearing	Description	Accuracy (ft.)	Latitude / Longitude	
						Latitude	Longitude
1	27	11/29/07 11:07 AM	W	OUTER GATE TO DRIVEWAY ON EASTERN SIDE OF FACILITY ENTERING FROM MARIETTA BLVD. OBSERVED 2 MEN WALKING AROUND GATE.	-	-	-
2	28	11/29/07 11:07 AM	W	OUTER GATE TO DRIVEWAY ON EASTERN SIDE OF FACILITY ENTERING FROM MARIETTA BLVD.	-	-	-
3	29	11/29/07 11:08 AM	W	OUTER GATE TO DRIVEWAY ON EASTERN SIDE OF FACILITY ENTERING FROM MARIETTA BLVD.	-	-	-
4	30	11/29/07 11:08 AM	W	OUTER GATE TO DRIVEWAY ON EASTERN SIDE OF FACILITY ENTERING FROM MARIETTA BLVD. NOTE WOMAN WALKING AROUND GATE.	-	-	-
5	31	11/29/07 11:12 AM	SW	ACTUAL FACILITY GATE ON EASTERN PROPERTY LINE. NOTICED PERSON NEARBY WALKING ON RAILROAD TRACKS.	-	-	-
6	32	11/29/07 11:14 AM	NW	EASTERN GATE. NOTE GAP ON END OF GATE AND LACK OF NO TRESPASSING SIGN.	-	-	-
7	33	11/29/07 11:15 AM	W	HOLE IN FENCE LOCATED SEVERAL FEET SOUTH OF EASTERN FACILITY GATE	-	-	-
8	34	11/29/07 11:19 AM	NE	UNLOCKED RAILROAD GATE LOCATED SEVERAL FEET NORTH OF MAIN EASTERN FACILITY GATE.	-	-	-
9	35	11/29/07 11:21 AM	E	CAMP #1. INDIGENT ENCAMPMENT ON EASTERN FACILITY BOUNDARY NORTH OF MAIN EASTERN FACILITY GATE AND RAILROAD GATE.	19	33.77570	84.42712
10	36	11/29/07 11:21 AM	E	INDIGENT ENCAMPMENT ON EASTERN FACILITY BOUNDARY NORTH OF MAIN EASTERN FACILITY GATE AND RAILROAD GATE.	19	33.77570	84.42712
11	37	11/29/07 11:23 AM	E	FACILITY BACKGROUND MONITORING WELL LOCATED APPROXIMATELY 20 FEET NORTH OF INDIGENT ENCAMPMENT. INDIGENTS ARE USING THE AREA AS A LATRINE (NOTE TOILET PAPER).	-	-	-
12	38	11/29/07 11:26 AM	NW	PROBABLE SOURCE. DRUM CONTAINING SOLID MATERIAL ACCORDING TO PREVIOUS INSPECTION REPORT	16	33.77610	84.42770
13	39	11/29/07 11:28 AM	S	CAMP #2. CHAIR IN AREA THAT APPEARS TO BE USED BY INDIGENTS.	15	33.77620	84.42773
14	40	11/29/07 11:29 AM	E	CAMP #2. FIRE CIRCLE IN AREA THAT APPEARS TO BE USED BY INDIGENTS.	8	33.77630	84.42785
15	41	11/29/07 11:36 AM	E	OPEN GATE ON EAST SIDE OF FACILITY LOCATED NORTH OF MAIN GATE.	8	33.77666	84.42720
16	42	11/29/07 11:45 AM	N	SITE REFERENCE POINT LOCATED AT INTERSECTION OF ONSITE ROADS. COORDINATES ARE FOR ACTUAL REFERENCE POINT.	14	33.77629	84.42834
17	43	11/29/07 11:47 AM	N	PROBABLE SOURCE. DRUM CONTAINING SOLIDS ACCORDING TO PREVIOUS INSPECTION REPORT.	14	33.77665	84.42822
18	44	11/29/07 11:52 AM	N	DOCUMENTED SOURCE. POLYMER POND. GPS READING TAKEN AT CENTER OF POND, PAVED DIMENSIONS OF DITCH AROUND POND ARE APPROXIMATELY 50'X100'.	15	33.77720	84.42790
19	45	11/29/07 12:00 PM	E	MONITORING WELL MW-16. NOTE RIPRAP IN DITCH AT POLYMER POND.	-	-	-
20	46	11/29/07 12:09 PM	N	CAMP #3. SLEEPING BAG LOCATED APPROXIMATELY 35 FEET FROM RIPRAP LINED DITCH AT POLYMER POND.	22	33.77740	84.42802
21	47	11/29/07 12:09 PM	E	OVERLAND RUNOFF ROUTE. RUN-ON PATHWAY. VIEW UPSTREAM ON BELLWOOD BRANCH OF CULVERT UNDERNEATH RAILROAD TRACKS NE OF POLYMER POND, TAKEN FROM SOUTHERN BANK.	21	33.77756	84.42807
22	48	11/29/07 12:18 PM	N	CAMP #3. CONCRETE CORES AND ARRANGEMENT OF ROCKS AND STICKS IN AREA THAT APPEARS TO BE USED BY INDIGENTS, LOCATED APPROXIMATELY 35' NORTH OF RIPRAP LINED DITCH AT POLYMER POND.	-	-	-
23	49	11/29/07 12:19 PM	N	CAMP #3. CLOSE-UP OF ARRANGEMENT OF ROCKS AND STICKS SHOWN IN PREVIOUS PHOTOGRAPH.	-	-	-
24	50	11/29/07 12:23 PM	N	CAMP #4. SLEEPING BAG LOCATED ON CONCRETE SLAB WEST OF POLYMER POND; AN AREA THAT APPEARS TO BE USED BY INDIGENTS.	-	-	-
25	51	11/29/07 12:24 PM	N	CAMP #4. BIBLE LOCATED ON CONCRETE SLAB WEST OF POLYMER POND; AN AREA THAT APPEARS TO BE USED BY INDIGENTS.	-	-	-

Photographic Log

Case Identifier: AZS CHEMICAL CO.
 EPA ID: GAD981237225/GAD057288144
 Location: 762 Marietta Blvd. NW, Atlanta, Fulton County, Georgia
 Photographer: Lawrence Papetti

Camera: Pentax
 Model: Optio W20
 S/N: 9314697

Photo Number	File Name	Date and Time	Orientation / Bearing	Description	Accuracy (ft.)	Latitude / Longitude	
						Latitude	Longitude
26	52	11/29/07 12:25 PM	S	CAMP #5. TELEPHOTO PICTURES OF INDIGENT ENCAMPMENT ON WESTERN SITE BOUNDARY, SOUTHWEST OF POLYMER POND.	-	-	-
27	53	11/29/07 12:25 PM	S	CAMP #5. TELEPHOTO PICTURES OF INDIGENT ENCAMPMENT ON WESTERN SITE BOUNDARY, SOUTHWEST OF POLYMER POND.	-	-	-
28	54	11/29/07 12:25 PM	S	CAMP #4. SLEEPING BAG ON GROUND LOCATED ON CONCRETE SLAB WEST OF POLYMER POND; AN AREA THAT APPEARS TO BE USED BY INDIGENTS.	-	-	-
29	55	11/29/07 12:30 PM	N	CAMP #5. INDIGENT ENCAMPMENT ON WESTERN SITE BOUNDARY, SOUTHWEST OF POLYMER POND. COORDINATES ARE FOR LOCATION OF PHOTOGRAPHER. PHOTOGRAPH IS FIRST OF THREE IN PANORAMA.	17	33.77655	84.42866
30	56	11/29/07 12:30 PM	N	CAMP #5. INDIGENT ENCAMPMENT ON WESTERN SITE BOUNDARY, SOUTHWEST OF POLYMER POND. COORDINATES ARE FOR LOCATION OF PHOTOGRAPHER. PHOTOGRAPH IS SECOND OF THREE IN PANORAMA.	17	33.77655	84.42866
31	57	11/29/07 12:30 PM	N	CAMP #5. INDIGENT ENCAMPMENT ON WESTERN SITE BOUNDARY, SOUTHWEST OF POLYMER POND. COORDINATES ARE FOR LOCATION OF PHOTOGRAPHER. PHOTOGRAPH IS THIRD OF THREE IN PANORAMA.	17	33.77655	84.42866
32	58	11/29/07 1:53 PM	N	PROBABLE SOURCE. DRUM THAT APPEARS TO BE FULL; UNKNOWN CONTENTS.	22	33.77495	84.42712
33	59	11/29/07 1:56 PM	N	PROBABLE SOURCE. OVERTURNED DRUM WITH APPARENT SALTS ON OUTSIDE.	20	33.77495	84.42732
34	60	11/29/07 1:59 PM	SW	PROBABLE SOURCE. OVERTURNED DRUM WITH APPARENT SALTS ON OUTSIDE.	20	33.77495	84.42732
35	61	11/29/07 2:02 PM	SW	CAMP #6. INDIGENT ENCAMPMENT.	20	33.77468	84.42780
36	62	11/29/07 2:06 PM	W	PROBABLE SOURCE. DRUM WITH UNKNOWN CONTENTS.	12	33.77478	84.42780
37	63	11/29/07 2:06 PM	NW	PROBABLE SOURCE. DRUM THAT ACCORDING TO TOM BRODELL CONTAINS SOLIDS. LOCATED NEAR MW-13.	21	33.77510	84.42788
38	64	11/29/07 2:12 PM	N	PROBABLE SOURCE. DRUM THAT CONTAINS SOLIDS ACCORDING TO TOM BRODELL.	13	33.77541	84.42803
39	65	11/29/07 2:14 PM	E	PUBLIX SHOPPING CARTS, IN GOOD CONDITION, LOCATED AT FORMER TRUCK LOADING DOCK FOR FORMER WAREHOUSE. EVIDENCE THAT INDIGENTS BRING FOOD TO SITE.	20	33.77530	84.42780
40	66	11/29/07 2:17 PM	W	DOCUMENTED SOURCE. SERIES POND. NOTE FOOTPATH. LAT/LONG COORDINATES OF THREE OF THE WELLS SURROUNDING SERIES POND ARE AS FOLLOWS: MW-13(S), 33.77496/84.42793, ACCURACY 22'; MW-6(I), 33.77486/84.42852, ACCURACY 17'; AND MW-7, 33.77525/84.42883, ACCURACY 22'. THE COORDINATES OF THESE THREE WELLS CAN BE RESOLVED TO DETERMINE THE APPROX. CENTER OF POND.	-	-	-
41	67	11/29/07 2:19 PM	NE	SOURCE CONTAINMENT FOR DOCUMENTED SOURCE. SINKHOLE ON EASTERN SIDE OF SERIES POND CAP. EVIDENCE OF POOR CONDITION OF CAP.	14	33.77494	84.42795
42	68	11/29/07 2:21 PM	N	CAMP #10. GRILL AND FOOD PACKAGING ON EASTERN EDGE OF SERIES POND CAP, ON CAP. EVIDENCE OF INDIGENTS COOKING.	13	33.77501	84.42817
43	69	11/29/07 2:35 PM	E	OVERLAND RUNOFF ROUTE FROM DOCUMENTED SOURCE. VIEW UPSTREAM OF DITCH DRAINING SERIES POND COVER. COORDINATES ARE FROM PHOTOGRAPHER'S POSITION.	21	33.77519	84.42882
44	70	11/29/07 2:37 PM	NW	CAMP #11. AREA APPARENTLY USED BY INDIGENTS TO EAT, LOCATED JUST OUTSIDE THE WESTERN FENCE, DUE WEST OF THE REMEDIATION SHED.	-	-	-
45	71	11/30/07 10:07 AM	W	RECOVERY WELL RW-4 LOCATED SOUTHWEST OF REMEDIATION BUILDING. WELL HAS ELECTRICITY AND IS RUNNING. WELL HAS A SPIGOT THAT PRODUCED WATER WHEN PUMP AUTOMATICALLY TURNED ON. AREA AROUND WELL IS CLEARED/TRAMPLED AND A FOOTPATH IS NEARBY (SEVERAL FEET). INDIGENTS MAY BE USING WATER FROM SPIGOT.	-	-	-
46	72	11/29/07 2:50 PM	SW	RECOVERY WELL RW-4.	-	-	-
47	73	11/29/07 2:52 PM	NW	VIEW FROM SW CORNER OF PROPERTY. NOTE FOOTPATH, RW-4, SERIES POND AND REMEDIATION SYSTEM FOR SERIES POND. PHOTOGRAPH 1 OF 5 IN PANORAMA.	-	-	-
48	74	11/29/07 2:52 PM	NE	ibid, PHOTOGRAPH 2 OF 5.	-	-	-
49	75	11/29/07 2:52 PM	NE	ibid, PHOTOGRAPH 3 OF 5	-	-	-
50	76	11/29/07 2:53 PM	NE	ibid, PHOTOGRAPH 4 OF 5	-	-	-

Photographic Log

Case Identifier: AZS CHEMICAL CO.
 EPA ID: GAD981237225/GAD057288144
 Location: 762 Marietta Blvd. NW, Atlanta, Fulton County, Georgia
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Camera: Pentax
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 S/N: 9314697

Photo Number	File Name	Date and Time	Orientation / Bearing	Description	Accuracy (ft.)		
						Latitude	Longitude
51	77	11/29/07 2:53 PM	NE	ibid. PHOTOGRAPH 5 OF 5	-	-	-
52	78	11/29/07 2:53 PM	S	CAMP #7. COORDINATES ARE OF PHOTOGRAPHER'S LOCATION. PHOTOGRAPH 1 OF 8 IN SERIES.	15	33.77454	84.42772
53	79	11/29/07 2:59 PM	E	CAMP #7. PHOTOGRAPH 2 OF 8	15	33.77454	84.42772
54	80	11/29/07 2:59 PM	E	CAMP #7. PHOTOGRAPH 3 OF 8	15	33.77454	84.42772
55	81	11/29/07 2:59 PM	E	CAMP #7. PHOTOGRAPH 4 OF 8. BLUE TENT IS APPROXIMATELY 50' EAST OF PHOTOGRAPHER.	15	33.77454	84.42772
56	82	11/29/07 3:00 PM	E	CAMP #7. PHOTOGRAPH 5 OF 8	15	33.77454	84.42772
57	83	11/29/07 3:00 PM	E	CAMP #7. PHOTOGRAPH 6 OF 8	15	33.77454	84.42772
58	84	11/29/07 3:00 PM	E	CAMP #7. PHOTOGRAPH 7 OF 8	15	33.77454	84.42772
59	85	11/29/07 3:00 PM	E	CAMP #7. PHOTOGRAPH 8 OF 8	15	33.77454	84.42772
60	86	11/29/07 3:02 PM	E	CAMPS #7 AND #8. INDIGENT ENCAMPMENTS AT AND OUTSIDE SOUTHERN FENCE LINE INCLUDING 2 TENTS, 1 SHACK, AND 1 TARP. TOOK PHOTOS AT GAP IN FENCE, JUST SOUTH OF SOUTHERN FENCE LINE. HEARD CHICKENS IN VICINITY. COORDINATES ARE FOR PHOTOGRAPHER'S LOCATION. PHOTO 1 OF 4.	20	33.77448	84.42772
61	87	11/29/07 3:02 PM	E	CAMP #9. PHOTOGRAPH 2 OF 4	20	33.77448	84.42772
62	88	11/29/07 3:02 PM	E	CAMPS #9 & #15. PHOTOGRAPH 3 OF 4	20	33.77448	84.42772
63	89	11/29/07 3:02 PM	E	CAMP #9 & #15. PHOTOGRAPH 4 OF 4	20	33.77448	84.42772
64	90	11/29/07 3:14 PM	NE	RECOVERY WELL RW-3. NOTE SPIGOT. NOT RUNNING. CIRCUIT BREAKER LIGHT INDICATES BREAKER IS TRIPPED BUT POWER ON.	-	-	-
65	91	11/29/07 3:16 PM	E	SPIGOT ON GROUNDWATER RECOVERY SYSTEM AT SERIES POND REMEDIATION SHED. SPIGOT PRODUCES WATER WHEN TURNED ON.	-	-	-
66	92	11/29/07 3:17 PM	W	RECOVERY WELL RW-2. NOTE SPIGOT. NOT RUNNING. CIRCUIT BREAKER LIGHT INDICATES BREAKER IS TRIPPED BUT POWER ON.	-	-	-
67	93	11/29/07 3:23 PM	N	BENCH MARK ON SITE MARKED AS FOLLOWS: N. 1373490.2180, E. 2216921.0390, 1002, ELEV. 872.968	not recorded	33.77559	84.42888
68	94	11/29/07 3:27 PM	W	TARP COVERING UNKNOWN ITEMS ON WESTERN PORTION OF SITE NEAR INDIGENT CAMP.	28	33.77635	84.42878
69	95	11/29/07 3:48 PM	E	CAMP #12. INDIGENT CAMP	21	33.77721	84.42908
70	96	11/29/07 3:57 PM	E	OVERLAND RUNOFF ROUTE. VIEW UPSTREAM ON BELLWOOD BRANCH NEAR WESTERN SITE BOUNDARY, APPROXIMATELY 100' UPSTREAM (E) OF FENCE.	25	33.77728	84.42891
71	97	11/29/07 4:03 PM	E	OVERLAND RUNOFF ROUTE. VIEW UPSTREAM ON BELLWOOD BRANCH FROM OUTSIDE (WEST) OF FACILITY FENCE.	-	-	-
72	98	11/29/07 4:14 PM	E	OVERLAND RUNOFF ROUTE. STORM DRAIN ENTRY POINT FROM INDUSTRIAL PARK DOWNSTREAM (S) OF SITE.	23	33.77582	84.43057
73	99	11/29/07 4:23 PM	NW	PPE. CONFLUENCE OF BELLWOOD BRANCH WITH PROCTOR CREEK. VIEW UPSTREAM ON BELLWOOD BRANCH..	30	33.77567	84.43119
74	100	11/29/07 4:23 PM	NE	PPE. CONFLUENCE OF BELLWOOD BRANCH WITH PROCTOR CREEK. VIEW UPSTREAM ON PROCTOR CREEK.	-	-	-
75	101	11/29/07 4:23 PM	SE	PPE. CONFLUENCE OF BELLWOOD BRANCH WITH PROCTOR CREEK. VIEW DOWNSTREAM ON PROCTOR CREEK.	-	-	-

Photographic Log

Case Identifier: AZS CHEMICAL CO.
 EPA ID: GAD981237225/GAD057288144
 Location: 762 Marietta Blvd. NW, Atlanta, Fulton County, Georgia
 Photographer: Lawrence Papetti

Camera: Pentax
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 S/N: 9314697

Photo Number	File Name	Date and Time	Orientation / Bearing	Description	Accuracy (ft.)	Latitude / Longitude	
						Latitude	Longitude
76	102	11/29/07 4:52 PM	SW	OVERLAND RUNOFF ROUTE RUN-ON PATHWAY. NORTHEASTERN CORNER OF FACILITY PROPERTY. CORNER POST HAS ORANGE FLAGGING. SMALL CREEK RUNS NEAR FENCE. PHOTOGRAPH 1 OF 3 IN SERIES.	-	-	-
77	103	11/29/07 4:53 PM	SW	PHOTOGRAPH 2 OF 3 IN SERIES.	-	-	-
78	104	11/29/07 4:53 PM	S	PHOTOGRAPH 3 OF 3 IN SERIES.	-	-	-
79	105	11/29/07 5:09 PM	W	CHICKENS NEAR SE CORNER OF FACILITY.	-	-	-
80	106	11/29/07 5:09 PM	W	CHICKENS NEAR SE CORNER OF FACILITY.	-	-	-
81	107	11/29/07 5:10 PM	E	DRUM NEAR SE CORNER OF FACILITY	14	33.77454	84.42686
82	108	11/29/07 5:13 PM	S	CAMP #13. VIEW THROUGH FENCE NEAR SE FACILITY BOUNDARY OF INDIGENT SHACK.	-	-	-
83	109	11/29/07 5:20 PM	E	CAMP #14. INDIGENT CAMP OUTSIDE OF MAIN (EASTERN) GATE NEAR RAILROAD TRACKS. LOCATED BETWEEN MAIN N-S RAIL LINE AND SPUR GOING TO SOUTHEAST UNDER BRIDGE, NEAR INTERSECTION OF TWO TRACKS. NOTICE ALUMINUM TRAY THAT APPEARS TO CONTAIN MEAT.	-	-	-



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
1	27	11:07 AM	11/29/2007	W	-	-	

Description: OUTER GATE TO DRIVEWAY ON EASTERN SIDE OF FACILITY ENTERING FROM MARIETTA BLVD. OBSERVED 2 MEN WALKING AROUND GATE.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
2	28	11:07 AM	11/29/2007	W	-	-	

Description: OUTER GATE TO DRIVEWAY ON EASTERN SIDE OF FACILITY ENTERING FROM MARIETTA BLVD.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
3	29	11:08 AM	11/29/2007	W	-	-	

Description: OUTER GATE TO DRIVEWAY ON EASTERN SIDE OF FACILITY ENTERING FROM MARIETTA BLVD.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
4	30	11:08 AM	11/29/2007	W	-	-	

Description: OUTER GATE TO DRIVEWAY ON EASTERN SIDE OF FACILITY ENTERING FROM MARIETTA BLVD.
NOTE WOMAN WALKING AROUND GATE.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
5	31	11:12 AM	11/29/2007	SW	-	-	

Description: ACTUAL FACILITY GATE ON EASTERN PROPERTY LINE. NOTICED PERSON NEARBY WALKING ON RAILROAD TRACKS.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
6	32	11:14 AM	11/29/2007	NW	-	-	

Description: EASTERN GATE. NOTE GAP ON END OF GATE AND LACK OF NO TRESPASSING SIGN.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
7	33	11:15 AM	11/29/2007	W	-	-	

Description: HOLE IN FENCE LOCATED SEVERAL FEET SOUTH OF EASTERN FACILITY GATE



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
8	34	11:19 AM	11/29/2007	NE	-	-	

Description: UNLOCKED RAILROAD GATE LOCATED SEVERAL FEET NORTH OF MAIN EASTERN FACILITY GATE.

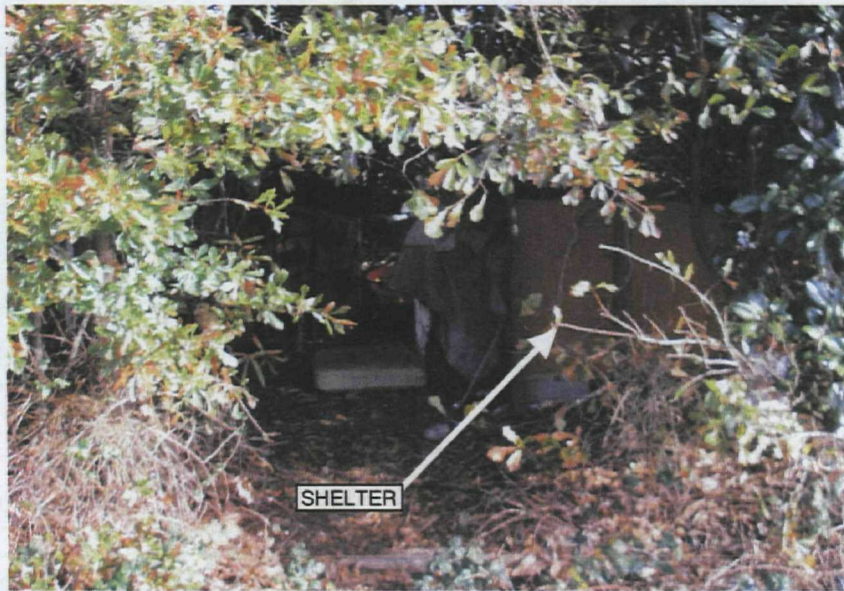


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
9	35	11:21 AM	11/29/2007	E	33.7757	84.42712	

Description: CAMP #1. INDIGENT ENCAMPMENT ON EASTERN FACILITY BOUNDARY NORTH OF MAIN EASTERN FACILITY GATE AND RAILROAD GATE.

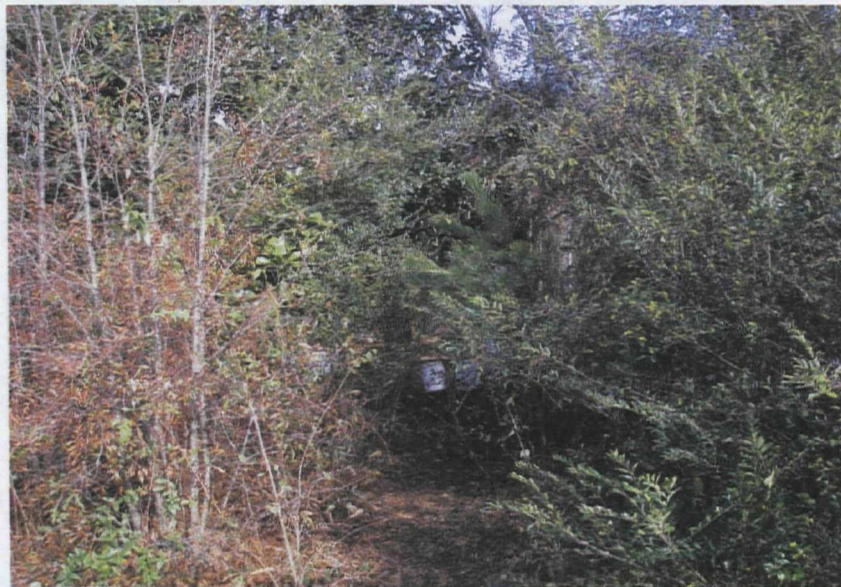


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
10	36	11:21 AM	11/29/2007	E	33.7757	84.42712	

Description: INDIGENT ENCAMPMENT ON EASTERN FACILITY BOUNDARY NORTH OF MAIN EASTERN FACILITY GATE AND RAILROAD GATE.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
11	37	11:23 AM	11/29/2007	E	-	-	

Description: FACILITY BACKGROUND MONITORING WELL LOCATED APPROXIMATELY 20 FEET NORTH OF INDIGENT EMCAMPMENT. INDIGENTS ARE USING THE AREA AS A LATRINE (NOTE TOILET PAPER).



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
12	38	11:26 AM	11/29/2007	NW	33.7761	84.4277	

Description: PROBABLE SOURCE. DRUM CONTAINING SOLID MATERIAL ACCORDING TO PREVIOUS INSPECTION REPORT



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
13	39	11:28 AM	11/29/2007	S	33.7762	84.42773	

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
Description: CAMP #2. CHAIR IN AREA THAT APPEARS TO BE USED BY INDIGENTS.																																																																																																			



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
14	40	11:29 AM	11/29/2007	E	33.7763	84.42785	

10	11/20/2007	11/20/2007	2	001700	01121700
Description: CAMP #2. FIRE CIRCLE IN AREA THAT APPEARS TO BE USED BY INDIGENTS.					



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
15	41	11:36 AM	11/29/2007	E	33.77666	84.4272	

Description: OPEN GATE ON EAST SIDE OF FACILITY LOCATED NORTH OF MAIN GATE.

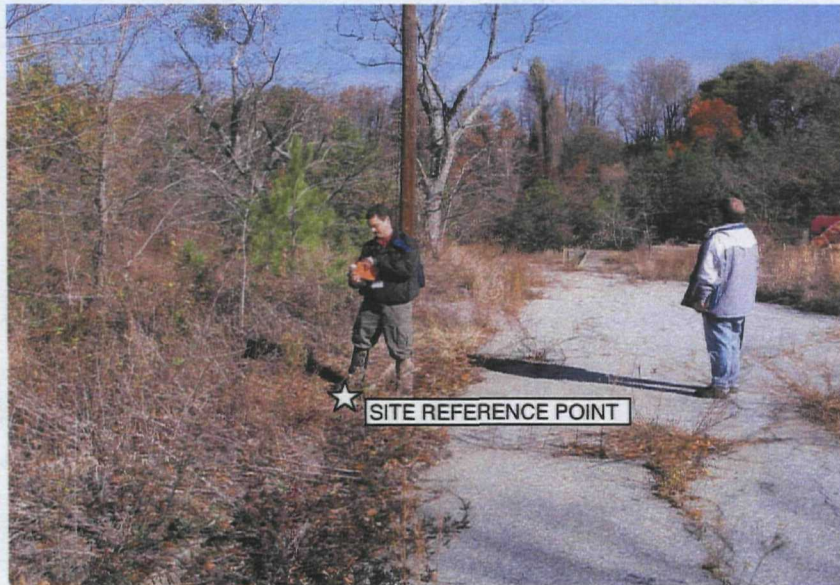


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
16	42	11:45 AM	11/29/2007	N	33.77629	84.42834	

Description: SITE REFERENCE POINT LOCATED AT INTERSECTION OF ONSITE ROADS. COORDINATES ARE FOR ACTUAL REFERENCE POINT.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
17	43	39,415	11/29/2007	N	33.77665	84.42822	
Description: PROBABLE SOURCE. DRUM CONTAINING SOLIDS ACCORDING TO PREVIOUS INSPECTION REPORT.							

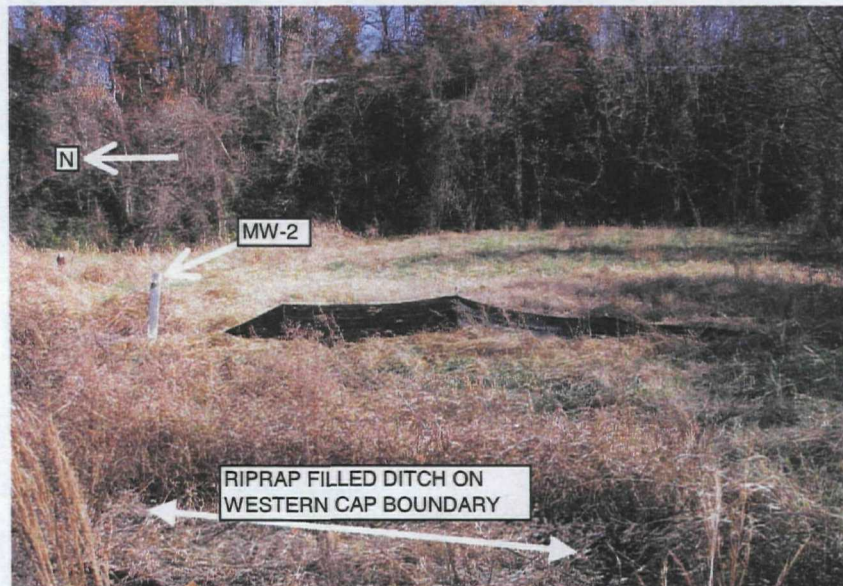


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
18	44	11:52 AM	11/29/2007	N	33.7772	84.4279	
Description: DOCUMENTED SOURCE. POLYMER POND. GPS READING TAKEN AT CENTER OF POND, PACED DIMENSIONS OF DITCH AROUND POND ARE APPROXIMATELY 50'X100'.							

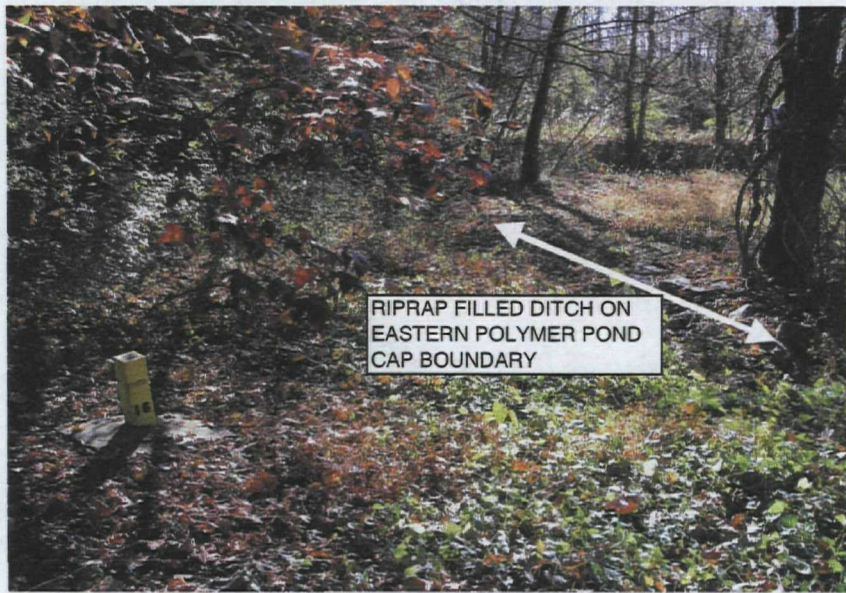


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
19	45	12:00 PM	11/29/2007	E	-	-	

Description: MONITORING WELL MW-16. NOTE RIPRAP IN DITCH AT POLYMER POND.

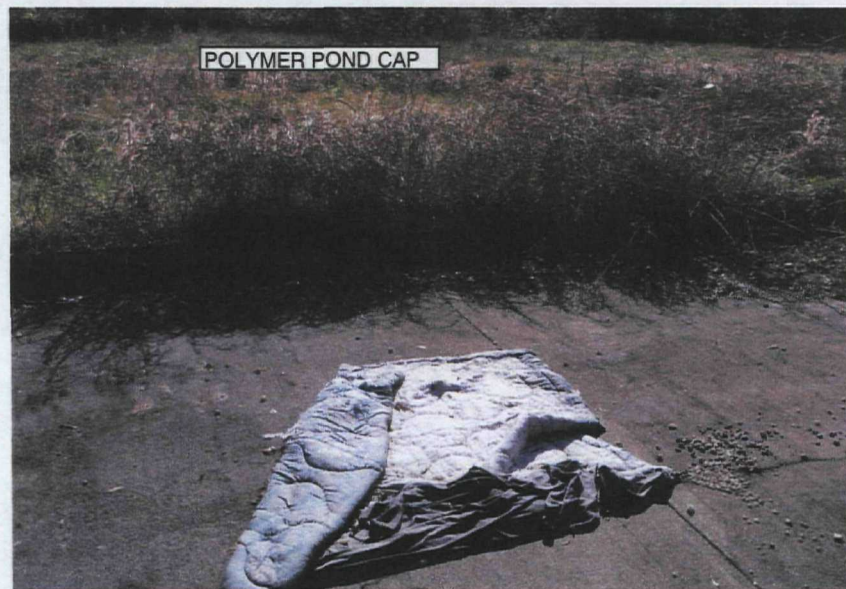


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
20	46	12:09 PM	11/29/2007	N	33.7774	84.42802	

Description: CAMP #3. SLEEPING BAG LOCATED APPROXIMATELY 35 FEET FROM RIPRAP LINED DITCH AT POLYMER POND.

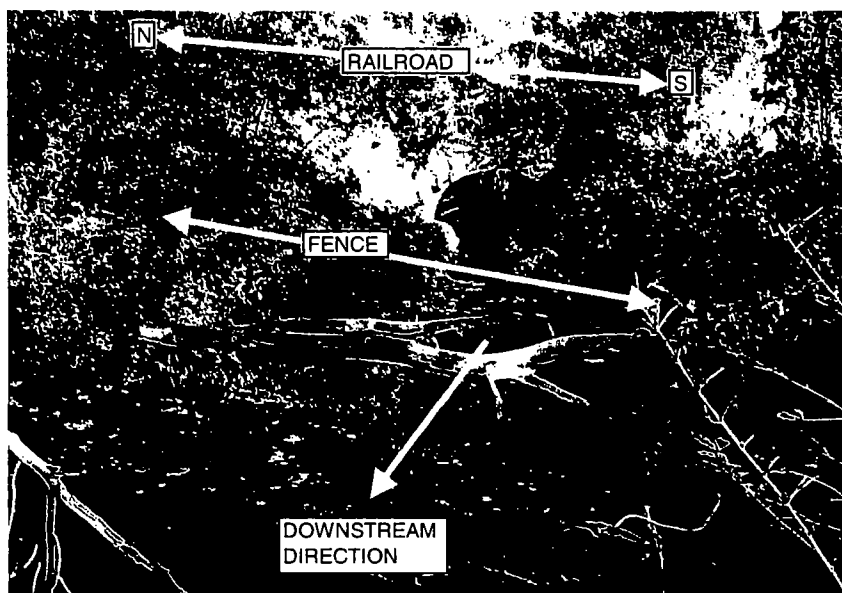


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
21	47	12:09 PM	11/29/2007	E	33.77756	84.42807	

Description: OVERLAND RUNOFF ROUTE. RUN-ON PATHWAY. VIEW UPSTREAM ON BELLWOOD BRANCH OF CULVERT UNDERNEATH RAILROAD TRACKS NE OF POLYMER POND, TAKEN FROM SOUTHERN BANK.

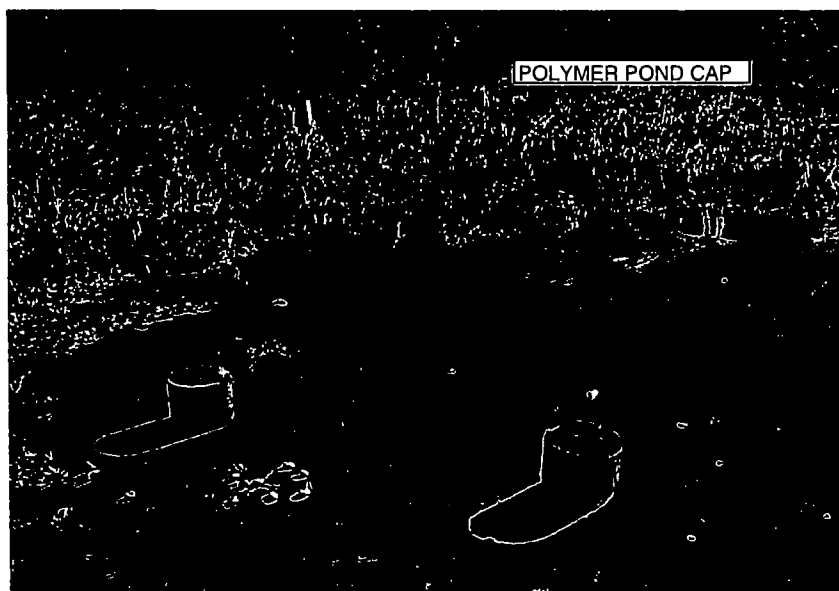


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
22	48	12:18 PM	11/29/2007	N	-	-	

Description: CAMP #3. CONCRETE CORES AND ARRANGEMENT OF ROCKS AND STICKS IN AREA THAT APPEARS TO BE USED BY INDIGENTS, LOCATED APPROXIMATELY 35' NORTH OF RIPRAP LINED DITCH AT POLYMER POND.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
23	49	12:19 PM	11/29/2007	N	-	-	

Description: CAMP #3. CLOSE-UP OF ARRANGEMENT OF ROCKS AND STICKS SHOWN IN PREVIOUS PHOTOGRAPH.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
24	50	12:23 PM	11/29/2007	N	-	-	

Description: CAMP #4. SLEEPING BAG LOCATED ON CONCRETE SLAB WEST OF POLYMER POND; AN AREA THAT APPEARS TO BE USED BY INDIGENTS.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
25	51	12:24 PM	11/29/2007	N	-	-	

Description: CAMP #4. BIBLE LOCATED ON CONCRETE SLAB WEST OF POLYMER POND; AN AREA THAT APPEARS TO BE USED BY INDIGENTS.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
26	52	12:25 PM	11/29/2007	S	-	-	

Description: CAMP #5. TELEPHOTO PICTURES OF INDIGENT ENCAMPMENT ON WESTERN SITE BOUNDARY, SOUTHWEST OF POLYMER POND.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
27	53	12:25 PM	11/29/2007	S	-	-	

Description: CAMP #5. TELEPHOTO PICTURES OF INDIGENT ENCAMPMENT ON WESTERN SITE BOUNDARY, SOUTHWEST OF POLYMER POND.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
28	54	12:25 PM	11/29/2007	S	-	-	

Description: CAMP #4. SLEEPING BAG ON GROUND LOCATED ON CONCRETE SLAB WEST OF POLYMER POND; AN AREA THAT APPEARS TO BE USED BY INDIGENTS.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
29	55	12:30 PM	11/29/2007	N	33.77655	84.42866	

00	12/20/74	12/20/74	14	0077000	0472000
Description: CAMP #5. INDIGENT ENCAMPMENT ON WESTERN SITE BOUNDARY, SOUTHWEST OF POLYMER POND. COORDINATES ARE FOR LOCATION OF PHOTOGRAPHER. PHOTOGRAPH IS FIRST OF THREE IN PANORAMA.					

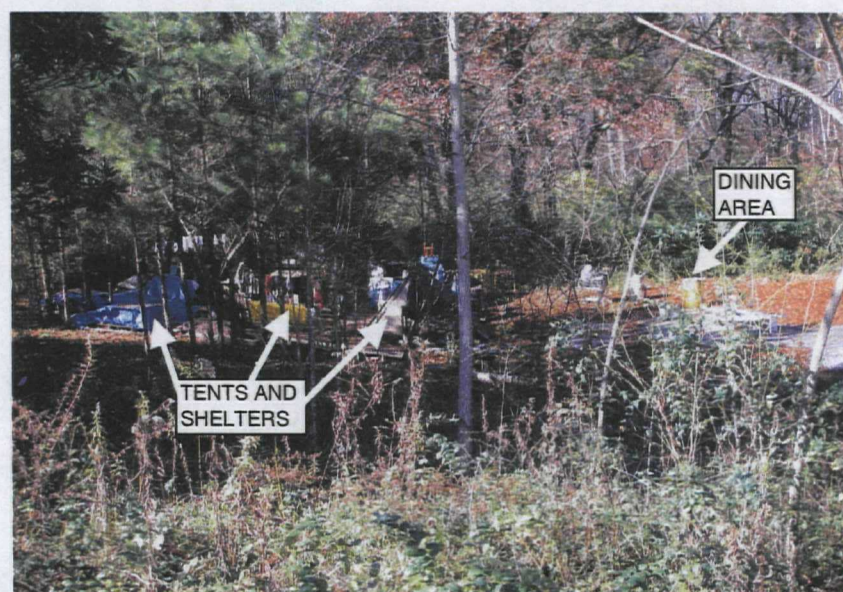


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
30	56	12:30 PM	11/29/2007	N	33.77655	84.42866	

Description: CAMP #5. INDIGENT ENCAMPMENT ON WESTERN SITE BOUNDARY, SOUTHWEST OF POLYMER POND. COORDINATES ARE FOR LOCATION OF PHOTOGRAPHER. PHOTOGRAPH IS SECOND OF THREE IN PANORAMA.

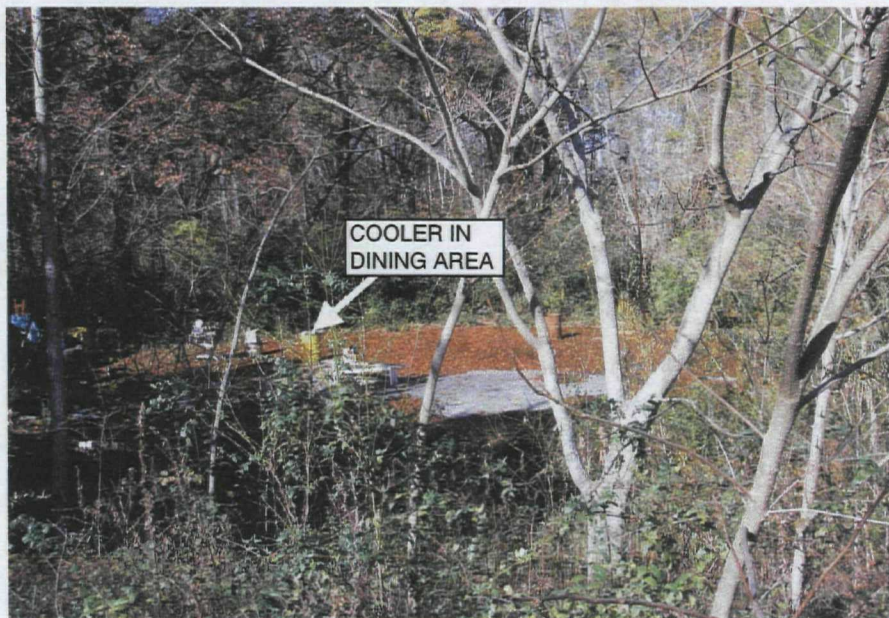


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
31	57	12:30 PM	11/29/2007	N	33.77655	84.42866	

Description: CAMP #5. INDIGENT ENCAMPMENT ON WESTERN SITE BOUNDARY, SOUTHWEST OF POLYMER POND. COORDINATES ARE FOR LOCATION OF PHOTOGRAPHER. PHOTOGRAPH IS THIRD OF THREE IN PANORAMA.

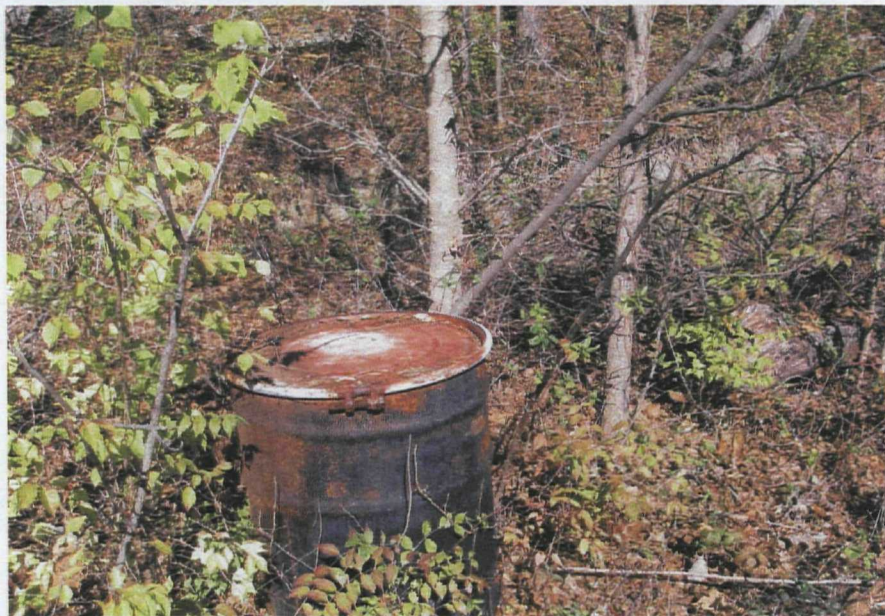


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
32	58	1:53 PM	11/29/2007	N	33.77495	84.42712	

00	1:55 PM 11/26/2007	N	00:77:55	0112712
Description: PROBABLE SOURCE. DRUM THAT APPEARS TO BE FULL; UNKNOWN CONTENTS.				



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
33	59	1:56 PM	11/29/2007	N	33.77495	84.42732	

Description: PROBABLE SOURCE. OVERTURNED DRUM WITH APPARENT SALTS ON OUTSIDE.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
34	60	1:59 PM	11/29/2007	SW	33.77495	84.42732	

Description: PROBABLE SOURCE. OVERTURNED DRUM WITH APPARENT SALTS ON OUTSIDE.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
35	61	2:02 PM	11/29/2007	SW	33.77468	84.4278	

Description: CAMP #6. INDIGENT ENCAMPMENT.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
36	62	2:06 PM	11/29/2007	W	33.77478	84.4278	

02	2017-01-11	11/23/2017	11	CONFIDENTIAL
Description: PROBABLE SOURCE. DRUM WITH UNKNOWN CONTENTS.				



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
37	63	2:06 PM	11/29/2007	NW	33.7751	84.42788	

Description: PROBABLE SOURCE. DRUM THAT ACCORDING TO TOM BRODELL CONTAINS SOLIDS. LOCATED NEAR MW-13.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
38	64	2:12 PM	11/29/2007	N	33.77541	84.42803	

Description: PROBABLE SOURCE. DRUM THAT CONTAINS SOLIDS ACCORDING TO TOM BRODELL.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
39	65	2:14 PM	11/29/2007	E	33.7753	84.4278	

Description: PUBlix SHOPPING CARTS, IN GOOD CONDITION, LOCATED AT FORMER TRUCK LOADING DOCK FOR FORMER WAREHOUSE. EVIDENCE THAT INDIGENTS BRING FOOD TO SITE.

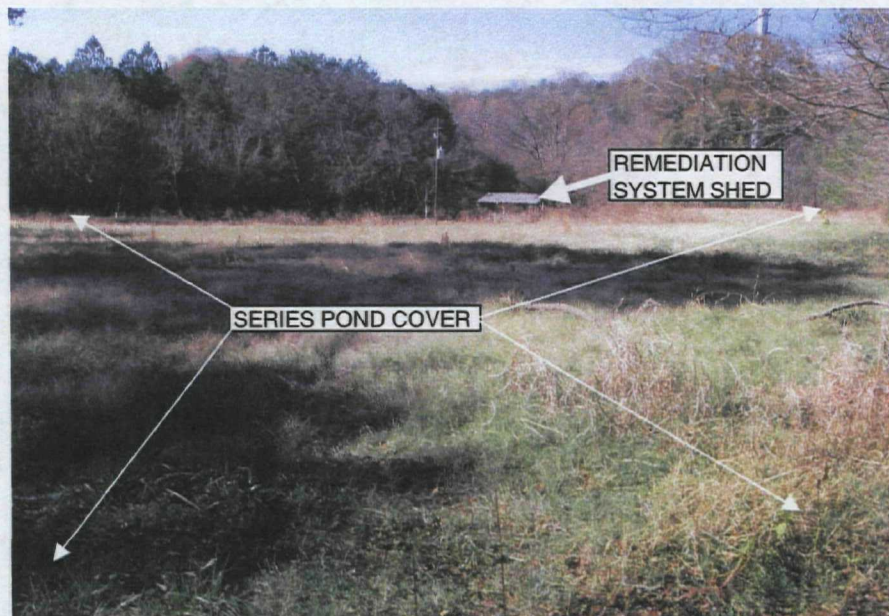


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
40	66	2:17 PM	11/29/2007	W	-	-	

Description:	DOCUMENTED SOURCE. SERIES POND. NOTE FOOTPATH. LAT/LONG COORDINATES OF THREE OF THE WELLS SURROUNDING SERIES POND ARE AS FOLLOWS: MW-13(S), 33.77496/84.42793, ACCURACY 22'; MW-6(I), 33.77486/84.42852, ACCURACY 17'; AND MW-7, 33.77525/84.42883, ACCURACY 22'. THE COORDINATES OF THESE THREE WELLS CAN BE RESOLVED TO DETERMINE THE APPROX. CENTER OF POND.
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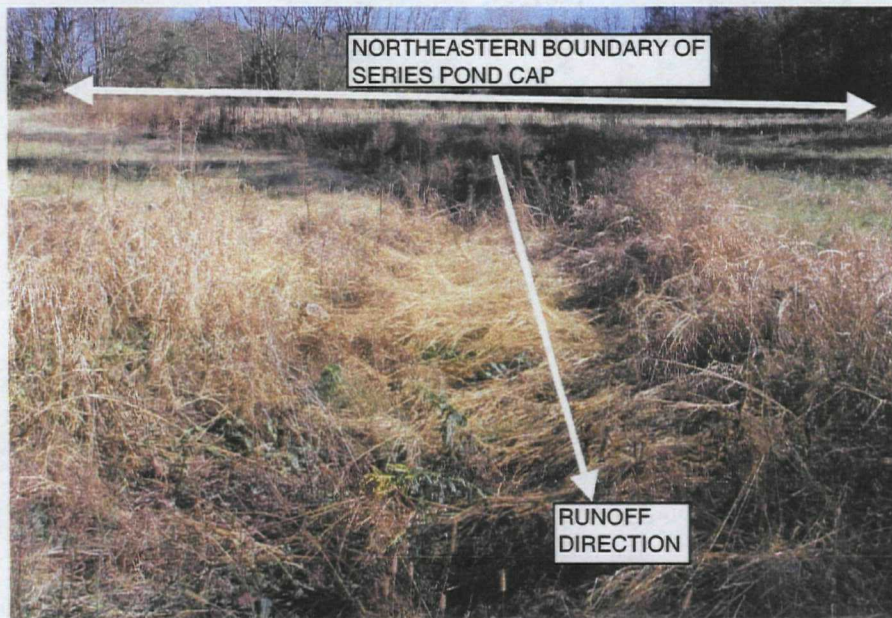


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
43	69	2:35 PM	11/29/2007	E	33.77519	84.42882	

Description: OVERLAND RUNOFF ROUTE FROM DOCUMENTED SOURCE. VIEW UPSTREAM OF DITCH DRAINING SERIES POND COVER. COORDINATES ARE FROM PHOTOGRAPHER'S POSITION.

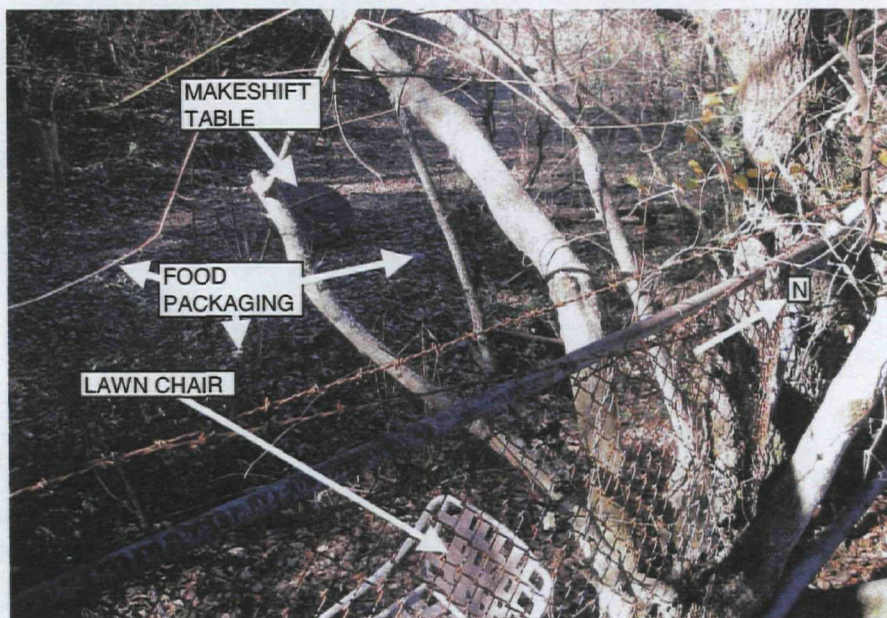


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
44	70	2:37 PM	11/29/2007	NW	-	-	

Description: CAMP #11. AREA APPARENTLY USED BY INDIGENTS TO EAT, LOCATED JUST OUTSIDE THE WESTERN FENCE, DUE WEST OF THE REMEDIATION SHED.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
45	71	10:07 AM	11/30/2007	W	-	-	

Description:	RECOVERY WELL RW-4 LOCATED SOUTHWEST OF REMEDIATION BUILDING. WELL HAS ELECTRICITY AND IS RUNNING. WELL HAS A SPIGOT THAT PRODUCED WATER WHEN PUMP AUTOMATICALLY TURNED ON. AREA AROUND WELL IS CLEARED/TRAMPLED AND A FOOTPATH IS NEARBY (SEVERAL FEET). INDIGENTS MAY BE USING WATER FROM SPIGOT.
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Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
46	72	2:50 PM	11/29/2007	SW	-	-	

72	2:00 PM	11/26/2007
Description: RECOVERY WELL RW-4.		

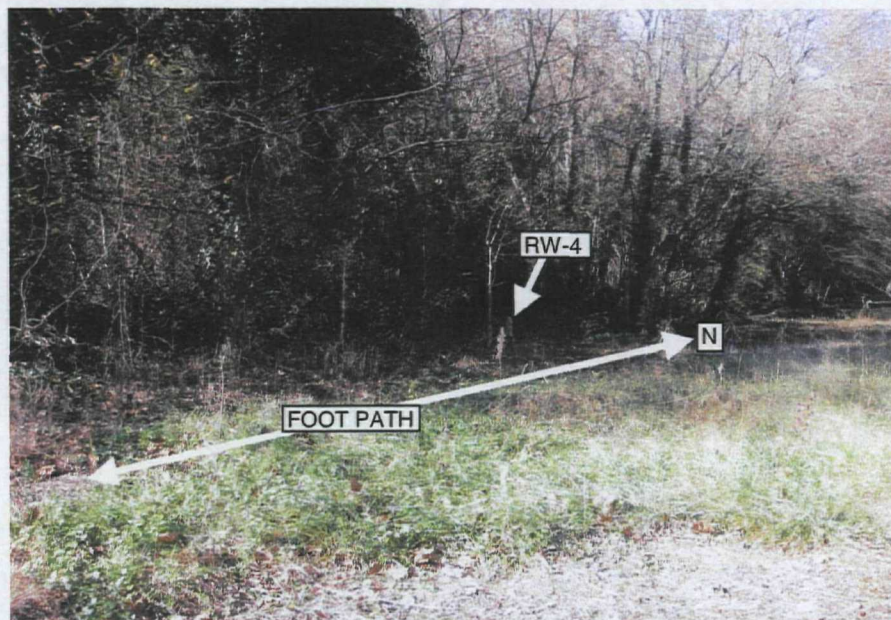


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
47	73	2:52 PM	11/29/2007	NW	-	-	

Description: VIEW FROM SW CORNER OF PROPERTY. NOTE FOOTPATH, RW-4, SERIES POND AND REMEDIATION SYSTEM FOR SERIES POND. PHOTOGRAPH 1 OF 5 IN PANORAMA.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
48	74	2:52 PM	11/29/2007	NE	-	-	

74	ENCLOSURE	1/1/20/2007
Description: ibid, PHOTOGRAPH 2 OF 5.		



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
49	75	2:52 PM	11/29/2007	NE	-	-	

Description: ibid. PHOTOGRAPH 3 OF 5



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
50	76	2:53 PM	11/29/2007	NE	-	-	

Description: ibid. PHOTOGRAPH 4 OF 5



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
51	77	2:53 PM	11/29/2007	NE	-	-	

Description: ibid. PHOTOGRAPH 5 OF 5

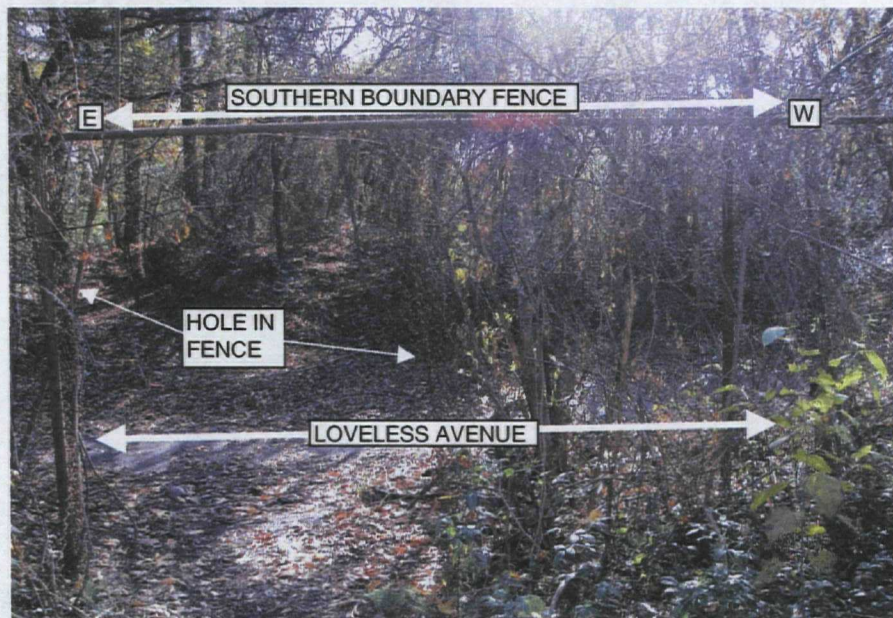


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
52	78	2:53 PM	11/29/2007	S	33.77454	84.42772	

Description: CAMP #7. COORDINATES ARE OF PHOTOGRAPHER'S LOCATION. PHOTOGRAPH 1 OF 8 IN SERIES.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
53	79	2:59 PM	11/29/2007	E	33.77454	84.42772	

Description: CAMP #7. PHOTOGRAPH 2 OF 8



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
54	80	2:59 PM	11/29/2007	E	33.77454	84.42772	

Description: CAMP #7. PHOTOGRAPH 3 OF 8



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
55	81	2:59 PM	11/29/2007	E	33.77454	84.42772	

Description: CAMP #7. PHOTOGRAPH 4 OF 8. BLUE TENT IS APPROXIMATELY 50' EAST OF PHOTOGRAPHER.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
56	82	3:00 PM	11/29/2007	E	33.77454	84.42772	

Description: CAMP #7. PHOTOGRAPH 5 OF 8



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
57	83	3:00 PM	11/29/2007	E	33.77454	84.42772	

Description: CAMP #7. PHOTOGRAPH 6 OF 8



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
58	84	3:00 PM	11/29/2007	E	33.77454	84.42772	

Description: CAMP #7. PHOTOGRAPH 7 OF 8



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
59	85	3:00 PM	11/29/2007	E	33.77454	84.42772	

Description: CAMP #7. PHOTOGRAPH 8 OF 8

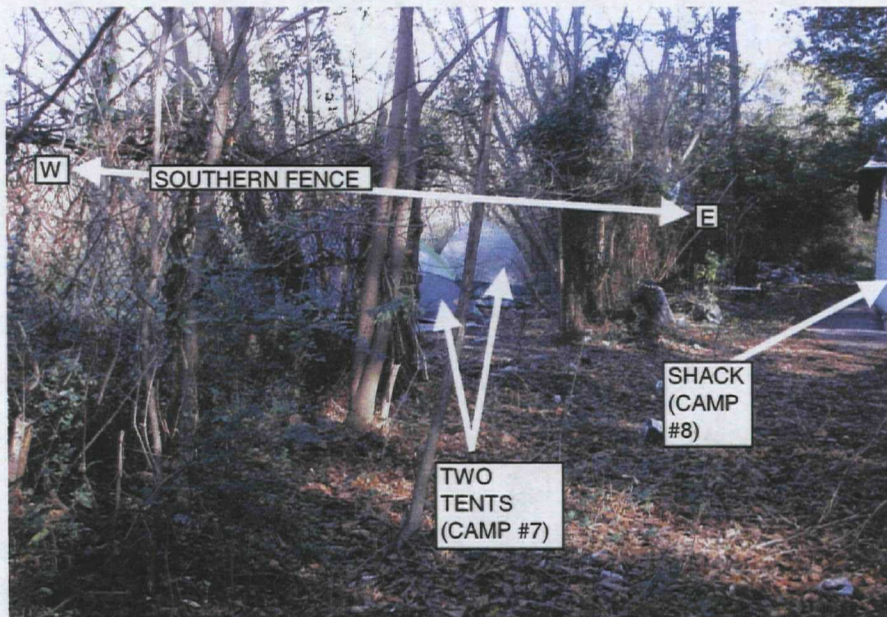


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
60	86	3:02 PM	11/29/2007	E	33.77448	84.42772	

Description: CAMPS #7 AND #8. INDIGENT ENCAMPMENTS AT AND OUTSIDE SOUTHERN FENCE LINE INCLUDING 2 TENTS, 1 SHACK, AND 1 TARP. TOOK PHOTOS AT GAP IN FENCE, JUST SOUTH OF SOUTHERN FENCE LINE. HEARD CHICKENS IN VICINITY. COORDINATES ARE FOR PHOTOGRAPHER'S LOCATION. PHOTO 1 OF 4.

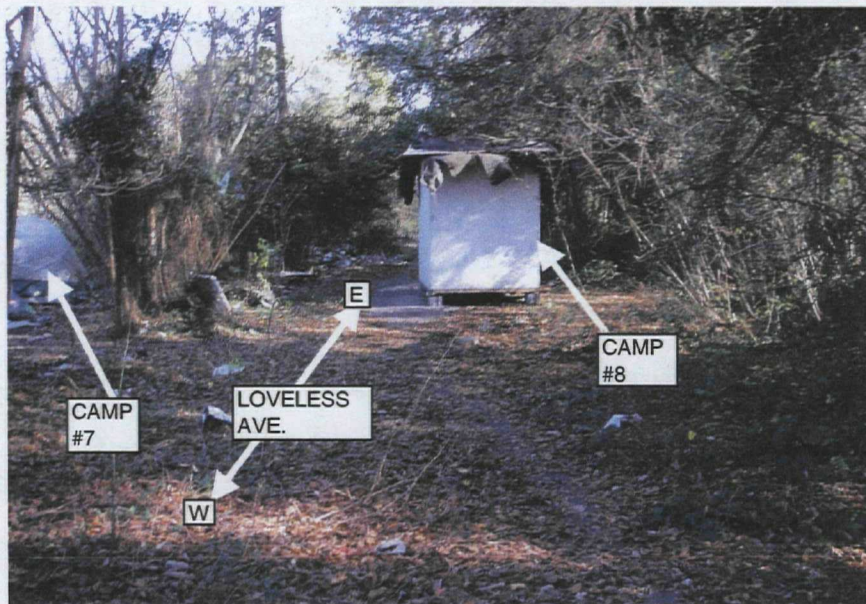


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
61	87	3:02 PM	11/29/2007	E	33.77448	84.42772	

Description: CAMP #9. PHOTOGRAPH 2 OF 4

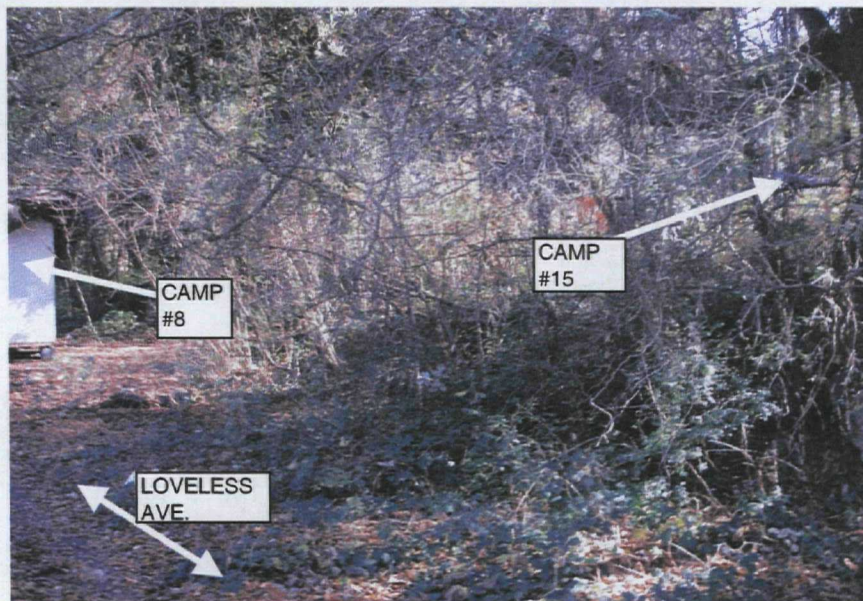


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
62	88	3:02 PM	11/29/2007	E	33.77448	84.42772	

Description: CAMPS #9 & #15. PHOTOGRAPH 3 OF 4



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
63	89	3:02 PM	11/29/2007	E	33.77448	84.42772	

Description: CAMP #9 & #15. PHOTOGRAPH 4 OF 4



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
64	90	3:14 PM	11/29/2007	NE	-	-	

Description: RECOVERY WELL RW-3. NOTE SPIGOT. NOT RUNNING. CIRCUIT BREAKER LIGHT INDICATES BREAKER IS TRIPPED BUT POWER ON.

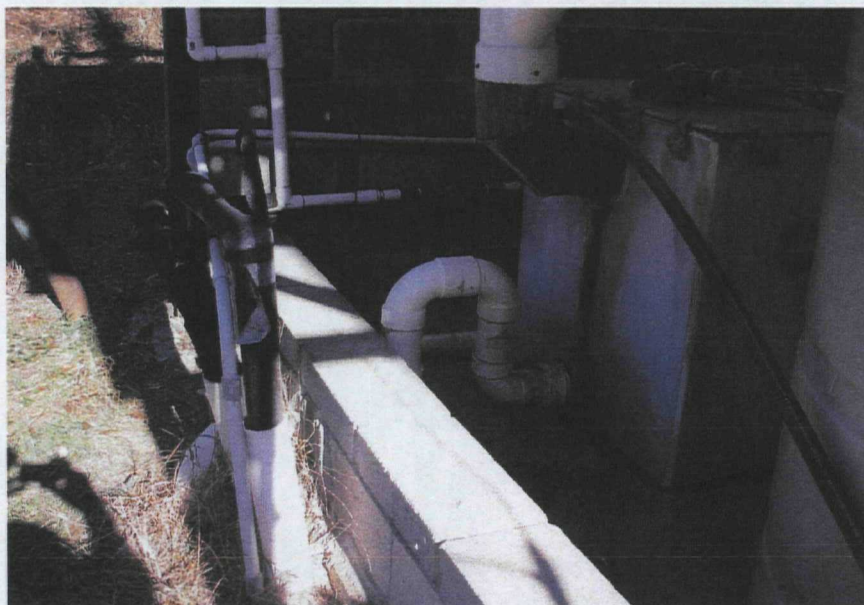
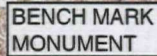


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)
65	91	3:16 PM	11/29/2007	E	-	-
Description: SPIGOT ON GROUNDWATER RECOVERY SYSTEM AT SERIES POND REMEDIATION SHED. SPIGOT PRODUCES WATER WHEN TURNED ON.						



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
66	92	3:17 PM	11/29/2007	W	-	-	
Description: RECOVERY WELL RW-2. NOTE SPIGOT. NOT RUNNING. CIRCUIT BREAKER LIGHT INDICATES BREAKER IS TRIPPED BUT POWER ON.							



Description: BENCH MARK ON SITE MARKED AS FOLLOWS: N. 1373490.2180, E. 2216921.0390, 1002, ELEV. 872.968



Description: TARP COVERING UNKNOWN ITEMS ON WESTERN PORTION OF SITE NEAR INDIGENT CAMP.



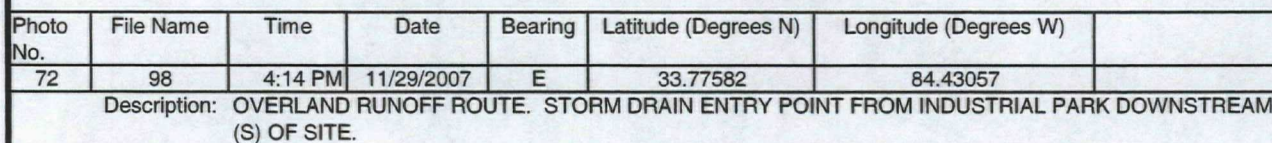
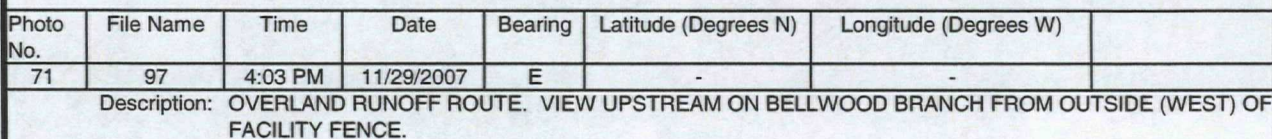
Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
69	95	3:48 PM	11/29/2007	E	33.77721	84.42908	

Description: CAMP #12. INDIGENT CAMP



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
70	96	3:57 PM	11/29/2007	E	33.77728	84.42891	

Description: OVERLAND RUNOFF ROUTE. VIEW UPSTREAM ON BELLWOOD BRANCH NEAR WESTERN SITE BOUNDARY, APPROXIMATELY 100' UPSTREAM (E) OF FENCE.



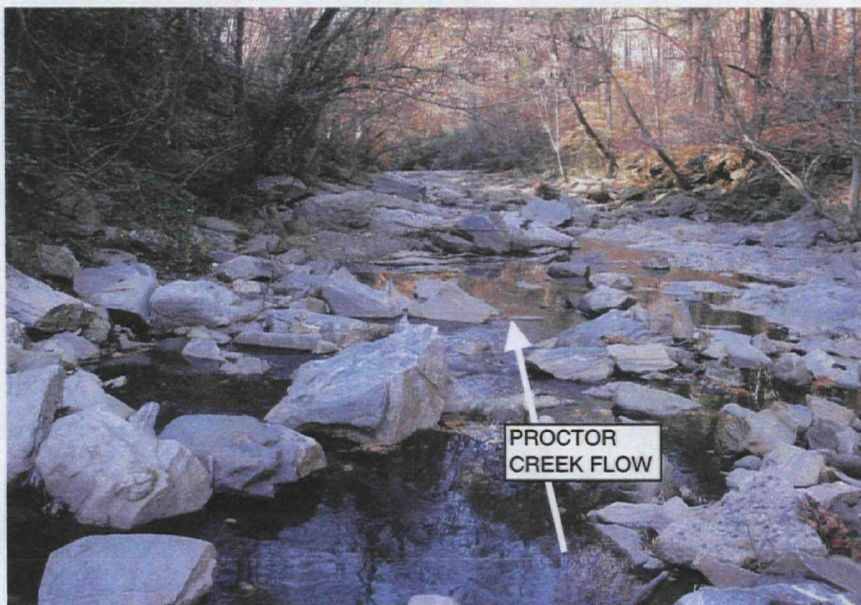


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
75	101	4:23 PM	11/29/2007	SE	-	-	

Description: PPE. CONFLUENCE OF BELLWOOD BRANCH WITH PROCTOR CREEK. VIEW DOWNSTREAM ON PROCTOR CREEK.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
76	102	4:52 PM	11/29/2007	SW	-	-	

OVERLAND RUNOFF ROUTE RUN-ON PATHWAY. NORTHEASTERN CORNER OF FACILITY PROPERTY. CORNER POST HAS ORANGE FLAGGING. SMALL CREEK RUNS NEAR FENCE. PHOTOGRAPH 1 OF 3 IN SERIES.

Description:



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
77	103	4:53 PM	11/29/2007	SW	-	-	

Description: PHOTOGRAPH 2 OF 3 IN SERIES.

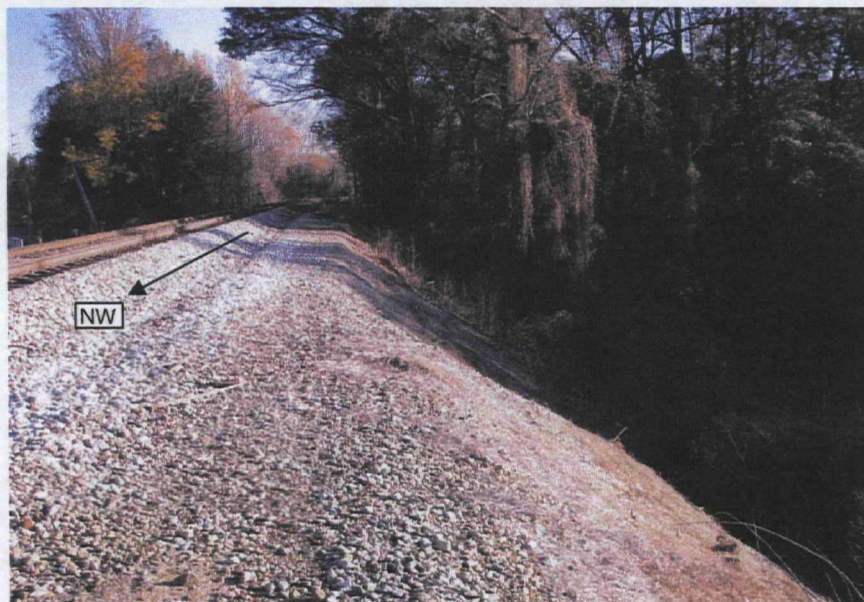


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
78	104	4:53 PM	11/29/2007	S	-	-	

Description: PHOTOGRAPH 3 OF 3 IN SERIES.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
79	105	5:09 PM	11/29/2007	W	-	-	

Description: CHICKENS NEAR SE CORNER OF FACILITY.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
80	106	5:09 PM	11/29/2007	W	-	-	

Description: CHICKENS NEAR SE CORNER OF FACILITY.



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
81	107	5:10 PM	11/29/2007	E	33.77454	84.42686	

Description: DRUM NEAR SE CORNER OF FACILITY



Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
82	108	5:13 PM	11/29/2007	S	-	-	

Description: CAMP #13. VIEW THROUGH FENCE NEAR SE FACILITY BOUNDARY OF INDIGENT SHACK.

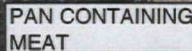


Photo No.	File Name	Time	Date	Bearing	Latitude (Degrees N)	Longitude (Degrees W)	
83	109	5:20 PM	11/29/2007	E	-	-	
Description: CAMP #14. INDIGENT CAMP OUTSIDE OF MAIN (EASTERN) GATE NEAR RAILROAD TRACKS. LOCATED BETWEEN MAIN N-S RAIL LINE AND SPUR GOING TO SOUTHEAST UNDER BRIDGE, NEAR INTERSECTION OF TWO TRACKS. NOTICE ALUMINUM TRAY THAT APPEARS TO CONTAIN MEAT.							

ATTACHMENT C
Logbook Documentation

Lawrence Papetti
Georgia E-PD
Hazardous Waste
Mgmt. Branch
(404) 656-2833



"Put in the Rain"
ALL WEATHER
FIELD BOOK
No. 350 NF

AZS/Cargill Facility
URS Investigation
Field Record

EPA ID #s
SAD981237225
SAD057288144

Lawrence E. Lett w/ Luis Medina 5

11-29-07

Tom Borelli

Recommissioner

0930 Depart Riv
SVK

062843 Bascom Mileage

121808 vehicle #

0945 Arrive On, L

1003 2 men walk on through
Front gate

1 woman leaves

Gate not actually
properly throughPhoto 1-11 of 2924
SVK

0027-0030

11-29-07

Walked around
side of site
@ coal.

Photo J - 0031
view SW
actual gate,
Person on RR
+ catch.

0032 NW of
east gate. No
surf. No sign.

0033 Hole in fence
south of the gate

11-29-07

0034 View NE of
unlocked RR gate
just N. of
main eastern gate

0035, 0036 View E
Homeless encampment

33.77570 N
084.42712 W. 19 ft.

0037 Backsl.
min. N 20' N
of encampment.

11-29-07

0038

Drum Tower Sand
 Contains Solid
 Material - has info
 from facility rep
 See Rev. Insects
 ref.

33.77610
 84.42770, 16'

0039

33.77620
 84.42772, 15'

Chair - Area
 use view
 3

11-29-07

0040 Fine
 Circle

33.77630
 84.42785, 8'

0041 Open gate,
 E. side of facility
 view east.

North of main gate

33.77666
 84.42720, 8'

0042 View N. side
 site Ref pt.

33.77629
 84.42834, 14'

1129-07

00413 View N.

~~Red~~ DismContains solids
according to Tom

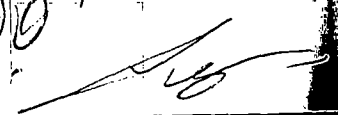
33.77665

84.42822, 14'

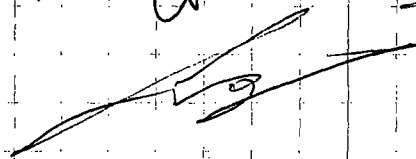
0044 View N.
of Polymer PondGPS @ center of
Polymer Pond

33.77720

84.42790 15'

Pond ~ 50' x 100'
as per d. 

1129-07

0.14 acre,
according to
surveyTom - inadequate
cover. Doesn't
extend to extent
of Pond shown
in drawings.

11-29-07

Tom said MW-16
is probably over
fmc. pad, and extent
of cover, as
indicated by riprap
border, doesn't extend
that far.

0045 View east
of MW-16. 33.77732
84.42802

Note riprap marks
edge of Polymer
Pond.

11-29-07

Note -
the flood plain
may extend
to ~~NE~~^{NE} corner
of pond.

0046 Sheeps bag, N
~~W~~ of Polymer pond

33.77740

84.42802

22'

~35' from pond
as faced.

11-29-07

0047

VIEW E upstream
on stream
lead on, under RR
fracture, NE of
Polymer Pond.

Taken from southern
bank @

33.77756

84.42807

21'

0048

Stools

Conch (see)

11-29-07

4 STONES

"Workshop site"

stone in fracture

w/ CO₂

N 35' N. of

Polymer Pond

0050 view N

0051 Shallowest bas

33.7702

84.42835

located W. of

Polymer Pond

0052-0054

Less - photo of
Carroll W. of Pond

Didn't record
full number

1129-07

0055-0057
Parut homeless
encampment

33.77655
84.42866 17'

~~from~~ photographer
location.

View N.

0058 Drum View ~~W~~

Full. Unknown
center,

33.77495
84.42712 22'

~~8~~

1129-07

0059 N Drum View ~~W~~
0060 ^{EU} 33.77495 ~~W~~
84.42732 20'

Drum near Salt-

0061 View SW
Camp.

33.77468
84.42780 20'

0062
33.77478
84.42780 12'
View W.
Drum.

1129-07

0063 Drum w/

Solid

View NW. Drum

w/ solid

Near MW-13

33.77510

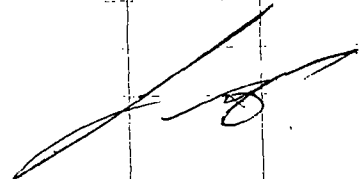
84.42788 21'

0064 View N

Drum Solid

33.77541

84.42780 35'



1129-07

0065

Publix Shopping

Cart

33.77532

84.42780 20'

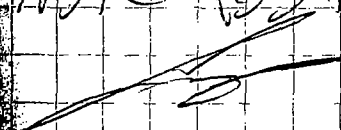
@ fork load in
dock for Fmr.

Warehouse

0066 View of

Levee Road 40 W.

NOTE for path.



1729-07

0067

slot hole on
easton edge
of lower part
Cap.

33.77494

84.42795 14



1729-07

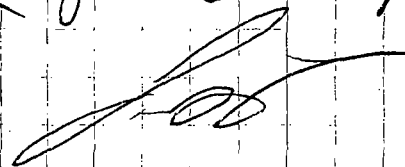
0068 View N.

33.77501

84.42817, 13

Grill and food
plasma. Evidence
of cooking.

Easton edge
of lower part
Cap. on Cap



112907

GPS readings
for MWs
around Lesner port
MW-13(s)

33.77496

84.42703 22'

MW-6(I)

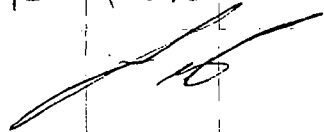
33.77486

84.42855 17'

MW-7

33.77525

84.42883 22'



112907

0069 View

Upstream of ditch
at Lesner port
E. side of road

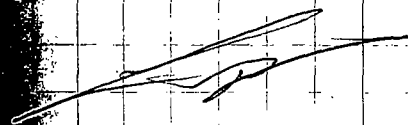
33.77519

84.42882, 21'

0070 View NW

of "Leaning Corner"

Just outside
western fence,
due W. of
remediation shed.



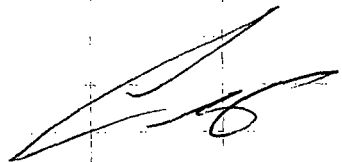
11-29-07

0071

Rein. well # 4

SW of remediation
bids.

Has power, spigot.

Homeless people could
conceivably drink
from well.Tom tried faucet
or it produced
water. Pump
had kicked on
automatically.

11-29-07

0072 RW-4

view to SW

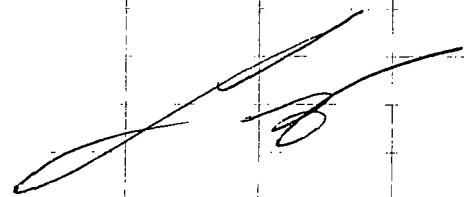
Area around well
is clearedPeople apparently
walk up to well.

Footpath is nearby

0073 0077 view
from shot N.E. for
SW corner prop.
Note Footpath
RW-4, 10 ft from
(recovered) system

1H29-07

Note - Tom
has a map from
microfiche #14
showing abundant
pond. Appears to
be almost as big
as some pond.
Need to see
map.



1H29-07

0078-0085

"Castle" (camp)
photo from

33.77454

84.42772 15'

Tent 1, ~ 50'
E of photos.

0086-0089

33.77448

84.42772, 20'

2 tents, ~~1 shack~~

1 shack

1 tarp

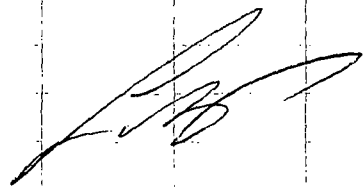
P/O 164.

to

11-29-07

Turn photo
 @ 9:10 to fence
 just south of
 Southern fence
 line.

Note - Heard
 chicken in
 vicinity.



11-29-07

0090 View NE
 of Ru-3. Note
 spist. Tunnel has
 small drop.

Circuit breaker
 light indicates
 is tripped.

0091 spist on
 Ru (over) system

0092 View W.
 Ru-2. Has
 spist. power on
 breaker ~~tripped~~.

1/29/07

0093

Bench Mark

N. 1373490.2180

E 2216921.03%

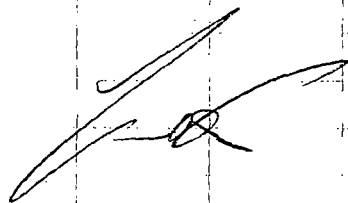
1002

Elev 872.968

GPS reading

33.77559

84.42888



1/29/07

0094 Photo of
twp corner, entrance
item 2.

33.77635

84.42878 28'

0095

33.77721

84.42908, 21'

VIEW E.

Camp.

0096 33.77728
84.42891 25'

VIEW E. of item

in Bellwood Ch
near west boundary
N 100' of HC of parcel

1129-07

0097 View
upstr. on Bellwood
Ch. @ W.
Prop. boundary.

0098 Stream
Nala entered
Point from
Industrial Estate?
Downstream from
Site

33.77582
84.43057 23'

1129-07

99-101

PPE (?)

Confluence of
Bellwood &
Proctor Ch

33.77567

84.43119 30'

99 View upstr.
on Proctor Ch

100 View upstr.
on Bellwood Ch

101 View looking
on Proctor Ch

1129-07

102-104 views SW
SE of NE Prop. bound.
Corner post has
orange flagging

105-107

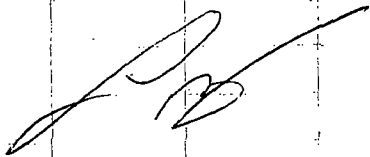
105-106

Chicken, view W

107 Drum view E

Q SE corner of
site.

32.77454, 84.42686
14'

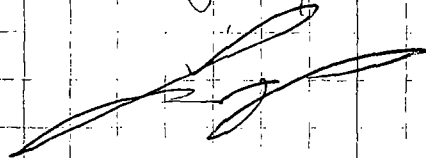


1129-07

108 view S
through fence
near SE Prop.
boundary of
Indiano Shakt.
Is near blue
flag seen before.

109 Homeless Camp
View E.


Noticed aluminum
rod w/ BDA(?)



062859
062843

16

715 leave off c



ATTACHMENT D
Site Health and Safety Plan

Site Health and Safety Plan

Site: AZS/Cargill (EPA ID No.
GAD981237225/GAD057288144)

Address: 762 Marietta Blvd. N.W., Atlanta, Georgia 30318

Project: Field Reconnaissance for Hazard Ranking System
Investigation

Project Duration: 1 Day

Project Coordinator: Lawrence Papetti, Georgia Environmental Protection
Division (EPD)

Field Operations: Lawrence Papetti-EPD, HWMB
Luis Medina-EPD, HWMB
Tom Brodell-EPD, HWMB

OSHA Certification and Medical Monitoring:

Each member of the field operations team has had 40 hour OSHA Health and Safety Training, and will be current on their annual OSHA refresher (8 hour) requirements and respirator fit testing. All team members participate in a medical-monitoring program, including annual physicals and a baseline exam. In the event of a suspected exposure to any hazardous substance, a physician will examine the team member no later than the next day.

Project Description:

For the current site visit, the field team will perform reconnaissance activities. The field team will perform source characterization and target survey activities by traversing the area identified in file documentation as the AZS Facility, reconnoitering targets surrounding and downstream of suspected sources, conducting interviews with local residents and officials, taking photographs, and obtaining other pertinent documentation.

Sampling Process:

The field team will not collect environmental media samples during this reconnaissance visit.

Primary Suspected Chemical/Hazard:

The following hazardous wastes are known to have once been generated or stored onsite: toluene, amine forecut, MIBK, epichlorohydrin, nonchlorinated solvents, chlorinated solvents, used oil mixed with F002 and F003 listed wastes, methylene chloride, carbon disulfide, acetone,

1,1-dichloroethylene, chloroform, 1,1,1-trichloroethane, 1,3-dichloropropene, benzene, chlorobenzene, carbon tetrachloride, tetrachloroethylene, toluene, methyl isobutyl ketone, 1,1-dichloroethylene, naphthalene, formaldehyde, and mercury.

Exposure Routes:

Because the field team will not perform any sampling activities during field reconnaissance, there is no anticipated exposure route for PCE.

Other Possible Hazards at the Site:

Other possible hazards include the following:

- **Slip/trip/fall hazards:** The primary non-chemical hazard is expected to be the potential for injury while traversing steep, rough terrain along stream banks and hillsides.
- **Wildlife and insects:** Potential exposures to mosquitoes, wasps, ticks, fire ants, bears, wild boar, snakes, and other hazards related to hiking in a forest are expected.
- **Low temperatures:** Temperatures are expected to be cool (below 50 degrees Fahrenheit) and exposure is a risk.
- **Water hazards:** Walking along stream banks during field reconnaissance poses a potential drowning risk for someone who may lose their footing. Although some wading through shallow water is expected, field team members must not attempt to wade through potential swift currents or deep water.
- **Indigent population:** Several indigents are reported to be squatting on the site. Accordingly, members of the field team shall observe (at a minimum) the following precautions with respect to the indigents:
 - Do not initiate contact with indigents;
 - If contact is initiated by an indigent, respond respectfully and inoffensively; and
 - Do not enter or search the indigents' shelters.

Confined Space Entry:

There is no confined space entry anticipated for this study.

Monitoring and Prevention:

The field team will conduct a safety meeting upon arrival at the site. The team will review and discuss the chemical and physical hazards associated with the site.

Chemical Hazards:

The field crew will wear appropriate Level D personal protection equipment (PPE) including long pants; appropriate warm-weather attire, and protective gloves and rubber boots or overshoes as necessary. Because the field team will not perform any sampling activities during field reconnaissance, there is no anticipated exposure route for the chemicals listed above. Therefore, the field team will not actively monitor for organic vapors.

Physical Hazards:

Field team members will not walk alone. They will wear appropriate footwear for hiking in steep terrain, and for the weather conditions. Steep stream banks pose a particularly significant hazard and care should be taken to ensure proper footing. Field team members should not wade in deep water or swift currents. Field team members will have available a first-aid kit, and carry a snakebite kit.

Emergency Contacts:

In case of Emergency at the Site:

1. Call 911, and
2. When the situation is under control, notify the appropriate EPA/EPD Supervisors.

Emergency Contact Numbers:

Police, Fire, and Medical Aid 911

Nearest Hospital or Medical Facility

(See attached map on last page of this HASP)

This Site Safety Plan has been reviewed and constitutes the minimum health and safety requirements for EPD personnel investigating the AZS Facility at 762 Marietta Blvd. N.W. in Atlanta, Georgia. The project coordinator and the Health and Safety Officers have the authority to change these requirements based upon conditions present at the site.

EPD CERCLA Pre-Remedial Coordinator:

Andrew S. Taft Andrew S. Taft Date: 11/28/2007

Project Coordinator: Lawrence Papetti Date: 11/20/07

Health & Safety Officer: Lawrence Papetti Date: 11/18/07

The undersigned employees have read the above Site Safety Plan, are current on the requisite OSHA training, and have had a baseline medical examination.

[illegible]

HOSPITAL MAP



Start: 762 Marietta Blvd Nw
Atlanta, GA 30318-5128, US

End: Emory Crawford Long
Hospital: 404-686-4411
550 Peachtree St Ne, Atlanta, GA
30308, US

Notes:

Only text visible within note field will print.



Directions

Distance

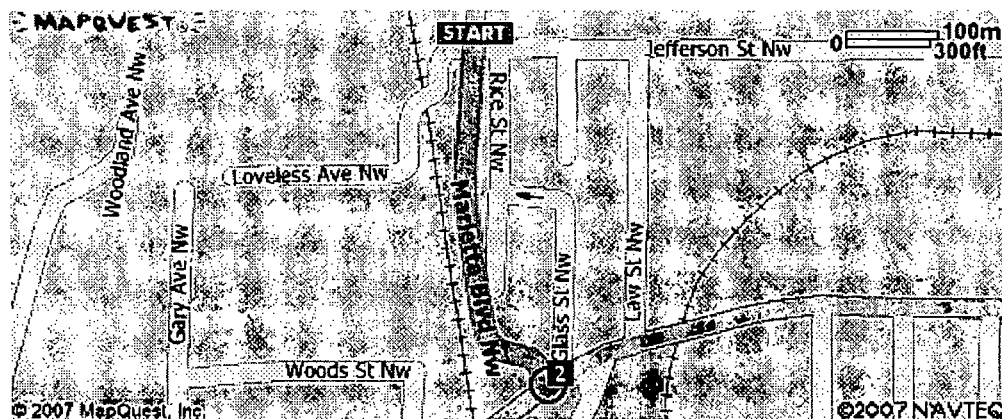
Total Est. Time: 7 minutes

Total Est. Distance: 2.76 miles

START

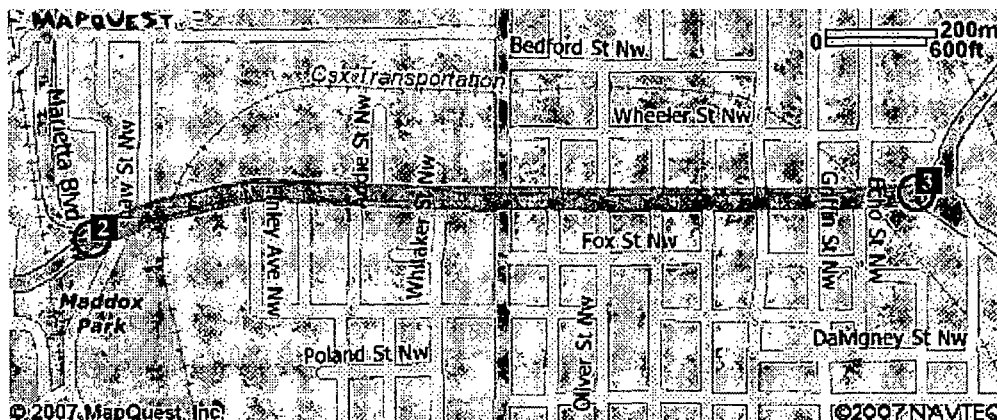
1: Start out going SOUTH on MARIETTA BLVD NW toward JEFFERSON ST NW.

0.2 miles



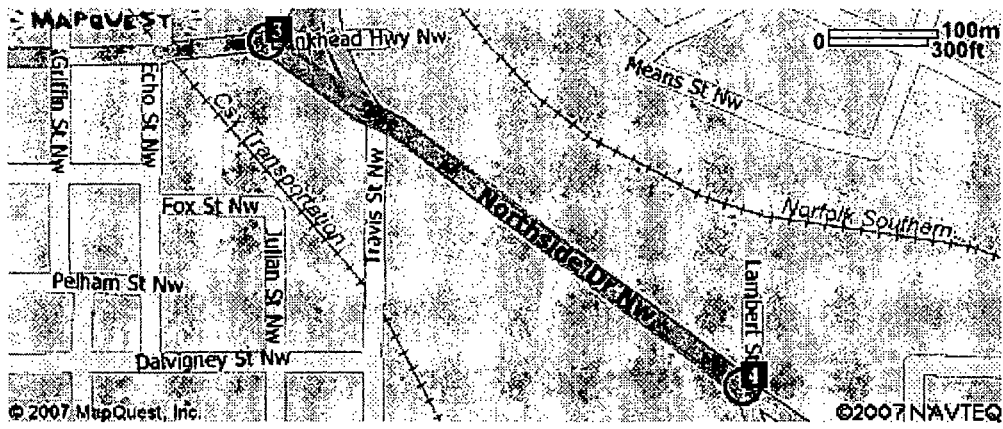
2: Turn LEFT onto BANKHEAD HWY NW / DONALD LEE HOLLOWELL PKWY NW / US-278 / US-78 / GA-8.

0.9 miles



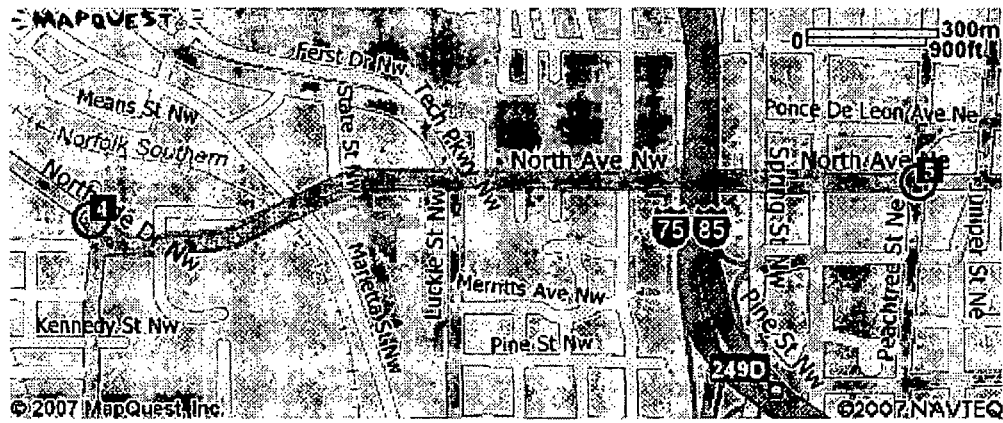
3: Turn SLIGHT RIGHT onto NORTHSIDE DR NW / US-19 S / US-41 S / GA-3 S / GA-9 S. Continue to follow NORTHSIDE DR NW / US-19 S / US-41 S / GA-3 S.

0.3 miles



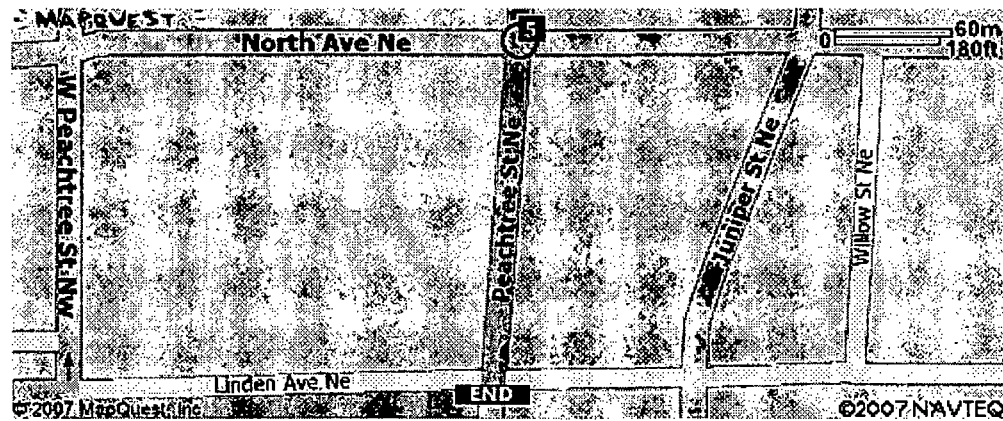
4: Turn SLIGHT LEFT onto NORTH AVE NW / US-278 / US-29 / US-78 / GA-8.

1.1 miles

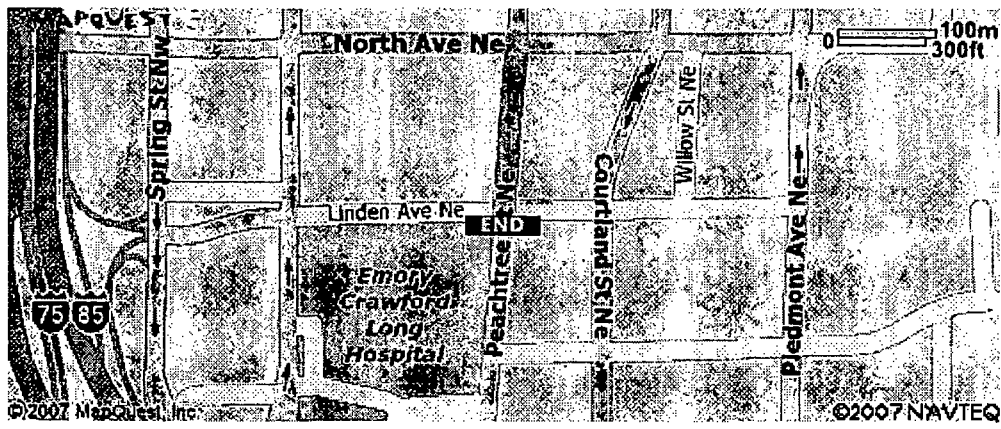


5: Turn RIGHT onto PEACHTREE ST NE.

0.1 miles

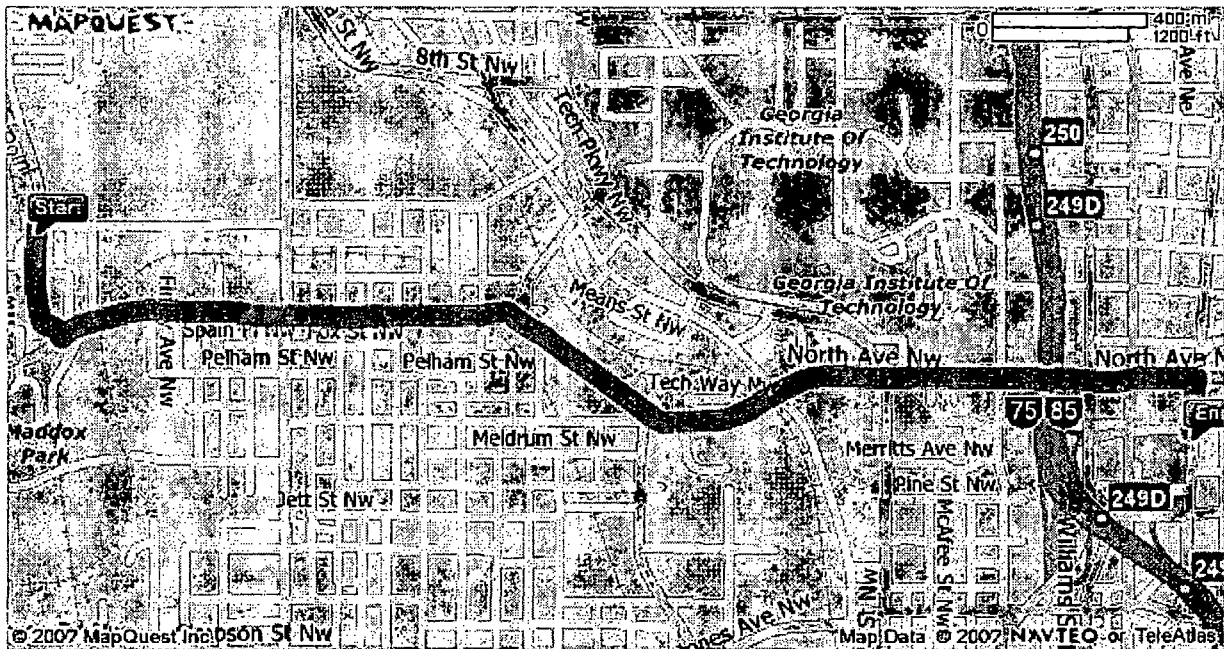


6: End at **Emory Crawford Long Hospital:**
550 Peachtree St Ne, Atlanta, GA 30308, US



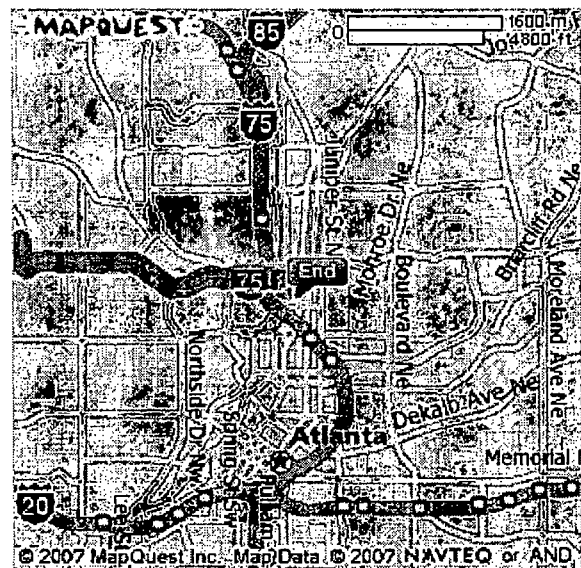
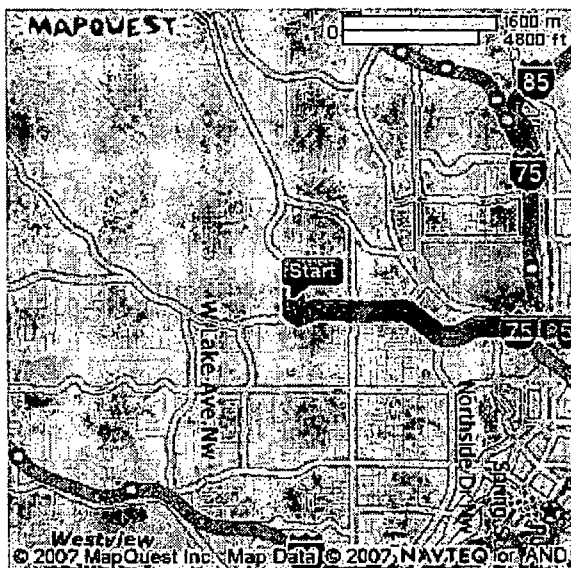
Total Est. Time: 7 minutes

Total Est. Distance: 2.76 miles



Start:
762 Marietta Blvd NW
 Atlanta, GA 30318-5128, US

End:
Emory Crawford Long Hospital:
 404-686-4411
 550 Peachtree St Ne, Atlanta, GA 30308,
 US



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These directions are informational only. No representation is made or warranty given as to their content, road conditions or route usability or expeditiousness. User assumes all risk of use. MapQuest and its suppliers assume no responsibility for any loss or delay resulting from such use.

Appendix B

Selected References

Georgia Department of Natural Resources

2 Martin Luther King Jr. Dr., Suite 1154 East, Atlanta, Georgia 30334

Noel Holcomb, Commissioner
Environmental Protection Division
Carol A. Couch, Ph.D., Director
404/656-7802

FILE COPY

October 11, 2007

TRIP REPORT

SITE NAME AND LOCATION:

AZS Corporation
762 Marietta Boulevard
Atlanta, Georgia
GAD981237225

TRIP BY:

Penny Gaynor, Geologist *pmc*

ACCOMPANIED BY:

Tom Brodell – Environmental Engineer
John Fonk – Unit Coordinator (9/24/07 only)
Becky Ferguson – Geologist (9/24/07 only)
Rick Hardy – Geologist (9/24/07 only)

DATE OF TRIP:

September 24, 2007
September 27, 2007

OFFICIALS CONTACTED:

Chuck Hill, Geologist
Dobbs Environmental

Denny Dobbs
Dobbs Environmental

REFERENCE:

Hazardous Waste Facility Permit
No. HW-051(D)

COMMENTS:

EPD representatives visited the AZS facility on September 24, 2007. On September 27, 2007 representatives of EPD visited the Dobbs Environmental offices in Covington, Georgia to review the facility records. The purpose of the site visit was to conduct an FFY 2007 Operation and Maintenance (O&M), Corrective Action Compliance (CAC), and Compliance Evaluation (CEI) Inspection of the facility. This report addresses only the O&M and CAC portion of the inspection, the CEI inspection is addressed in a separate report by Tom Brodell. The photographs referenced in this report are located in the photo log of the CEI report. Specifically, the purpose of the O&M and CAC Inspection was to: 1) assess the manner in which the facility is operating and maintaining the groundwater monitoring and corrective action program associated with the Series and Polymer Ponds and, 2) evaluate compliance with specific conditions of Hazardous Waste Facility Permit No. HW-051(D) and provisions of the Georgia Hazardous Waste Management Act and Rules.

On September 24, 2007, Tom Brodell, John Fonk, Becky Ferguson, Rick Hardy and I arrived at the facility at approximately 11:05 AM and met with Mr. Charles Hill of Dobbs Environmental (Dobbs). The

purpose of the visit was relayed to Mr. Hill at this time. The inspection included the measurement of both water level and total depth for 12 wells screened in the weathered bedrock, as well as visual inspection of 35 wells. The monitoring wells at the facility are screened in three zones: saprolite, weathered bedrock, and bedrock. Due to the uncertain conditions at the facility and unfamiliarity of the facility by both the compliance officer and the geologist, only the monitoring wells from one interval were gauged.

On September 27, 2007 representatives of EPD performed a records review at the offices of Dobbs Environmental in Covington, Georgia. During the records review it was noted that the laboratory analytical data packages for the groundwater sampling at the site did not include the State of Georgia Laboratory Certification. It was also noted that the sampling and analysis plan currently being used for the groundwater sampling is from the 2004 Post Closure Application which has not been approved by EPD.

A summary of the well measurements collected on September 24, 2007 is presented in Attachment A. The groundwater elevation data collected during the inspection were used to generate the groundwater potentiometric map (Attachment B) of the surficial aquifer located in the weathered bedrock. This map indicates that the predominant groundwater flow direction across the facility is toward the west northwest. In general, the groundwater flow pattern in the surficial aquifer on September 24, 2007, is consistent with previous facility mapping. A copy of the O & M Inspection Checklist is included as Attachment C.

CONCLUSIONS:

Thirty-five monitoring and/or recovery wells were inspected. Twelve monitoring wells had water level and total depth measurements taken. A review of the records required to be maintained for the groundwater monitoring network and corrective action program was also performed.

The following observations were noted:

According to Condition I.L.1. of the Permit, the monitoring wells shall be maintained at the facility pursuant to 40 CFR §264.97 and §264.100. The following observations were made with the regards to the monitoring well system:

1. The concrete apron at well MW-28 is cracked. Measures need to be taken to repair the concrete pad.
2. The concrete pads were not visible for inspection on wells MW-24, MW-45, and RW-4 (Photo 7). Measures must be taken to ensure that the concrete pads are kept free and clear of debris so that they may be inspected.
3. The concrete pad for MW-2 had been lifted and is damaged (Photo 20). This well was also reported as damaged in the 2004 Part B. Measures must be taken to repair MW-2.
4. The protective casing cap for MW-27 was missing (Photo 35). The protective casing for MW-27 must be repaired. The protective casing cap for MW-24 could not be closed because the PVC riser was obstructing the cap (Photo 7). The PVC riser must be adjusted so the protective casing cap can be closed and locked.
5. The reference measuring point was not clearly marked on several monitoring wells; measures need to be taken to clearly mark the measuring point.
6. None of the monitoring and/or recovery wells were locked or sealed to prevent possible contaminants from entering the groundwater (Photos 6 and 7). All monitoring and/or recovery wells must be locked or sealed to prevent possible contamination of the groundwater.

7. At the time of the inspection, MW-1 was recorded as dry with a total depth of 15.30 feet below the top of the casing. According to the well construction information, MW-1 was constructed with a total depth of 21.00 feet below the top of the casing. It is apparent that there is an obstruction in the well. Measures must be taken to remove the obstruction from the well. If the obstruction cannot be removed from the well then the well may need to be abandoned and a new well drilled to replace it.
8. RW-1 was not labeled. All wells must be clearly labeled.
9. Access to background well MW-1 presents a safety hazard due to the use of the area as a privy (Photo 1).

In accordance with Condition II.J.1. of the Permit, the Permittee shall following the inspection schedule as discussed in Section B and C of the permit application. The logs show the most recent inspection prior to the EPD inspection was conducted on August 14, 2007. The inspection log for that date states that six monitoring wells were inspected (MW-5, MW-6, MW-31, MW-32, MW-33, and MW-34) and found in "good" condition. The inspection log lacks any notation that the locks to all wells were removed during that inspection (as communicated by C. Hill during the EPD site visit on Sept. 24). In addition, there were several inspection logs in which not all the information was completed. MW-2 was damaged and was recognized as damaged in the 2004 Post Closure Application, but no records of MW-2 being inspected were found for 2006 and 2007. The last inspection record for MW-2 was December 2005 in which it was marked "good". All monitoring and recovery wells must be inspected quarterly, at a minimum, as described in the 1987 Post Closure Permit Application, or monthly, as described in the 2004 Post Closure Application. These inspections are essential to maintain the integrity of the wells, considering the lack of security at the site and the squatters using the property. Copies of the inspection reports are located in the Attachments of the CEI Trip Report prepared by Tom Brodell.

In accordance with Condition II.L.2. of the Permit, samples shall be collected as specified in Appendix III of the permit application. Dobbs is currently using the sampling and analysis plan submitted as part of the 2004 Part B application, which has not been approved by EPD. Until a revised sampling and analysis plan has been approved by EPD, all groundwater samples should be collected by the procedures specified in the Permit, or in accordance with the EPA Region IV EISOPQAM, 2001.

According to 40 CFR §264.100 and Condition II.M.1. of the Permit, the Permittee shall conduct a corrective action program to remove or treat in place any hazardous constituents that exceed the concentration limits in groundwater between the point of compliance and the downgradient facility property line as required under 40 CFR §264.100(e)(1), and beyond the facility boundary as required under 40 CFR §264.100(e)(2). The following comments are offered with regards to the corrective action system:

1. During the inspection, none of the four recovery wells (RW-1, RW-2R, RW-3, and RW-4) present at the facility were operating. According to Mr. Hill, well RW-1 is no longer used as a recovery well. Mr. Hill stated that no corrective action (i.e., groundwater recovery) is currently implemented at the Polymer Pond. Recovery wells RW-2R, RW-3, and RW-4 had not been operating since early August, when some of the copper wire used in the electrical system for the groundwater treatment had been stolen (Photos 26 and 27).
2. The corrective action system currently is not in compliance with the requirements of Condition II.M. of the existing permit (dated March 31, 1993). This particular permit condition requires a corrective action program as presented in Section X and XI of the permit application. These particular sections of the application require three recovery wells at the Series Ponds and one recovery well at the Polymer Pond. Currently, there is no groundwater recovery occurring at the Polymer Pond. This situation was also noted during the previous O & M Inspection (February

2000) and subsequently relayed to the facility. In addition, since the theft of the wire in early August, the three recovery wells for the Series Ponds have not been operating.

No documentation of laboratory certification could be found in any of the laboratory analytical data reports, as required by §391-3-26-.05(2) of the Rules of the Georgia Department of Natural Resources.

As described in the comments above, the facility has not complied with portions of 40 CFR 264 and permit HW-051(D).

RECOMMENDATIONS AND/OR FOLLOW-UP REQUIRED:

Send a Notice of Violation to the facility summarizing the findings of the inspection.

PHOTOGRAPHS: 45

SAMPLES: None

REVIEWED BY:



ATTACHMENTS:

- A. Summary of Groundwater Measurements
- B. Groundwater Potentiometric Surface Map
- C. O&M Inspection Checklist

FILE: AZS Corporation (R)

S:\RDRIVE\PENNY\AZS\FY07OAMTripReport.doc

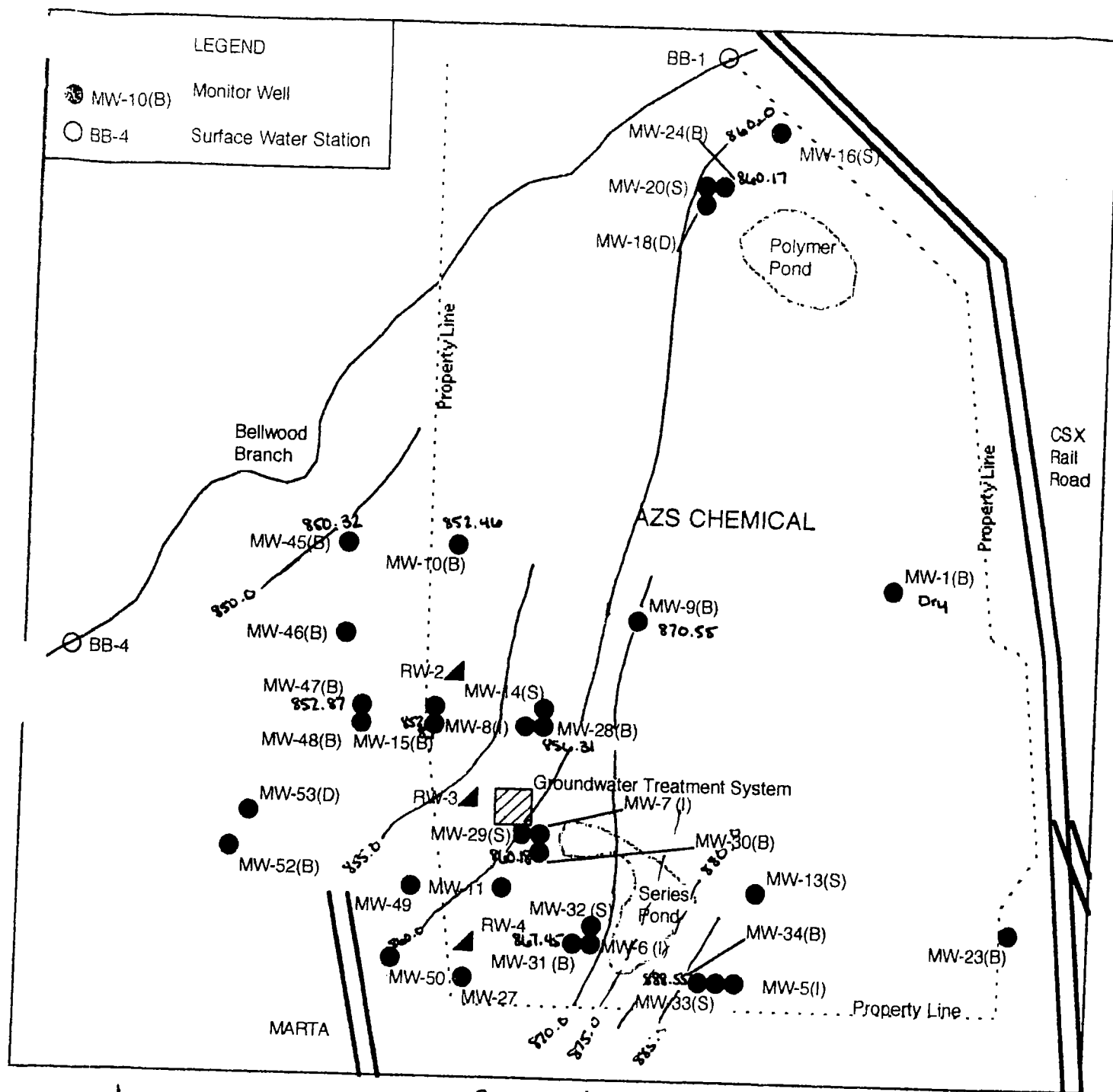
AZS Corporation
Summary of Groundwater Elevation Data
September 24, 2007

ATTACHMENT A

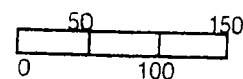
Well ID	Top of Casing Elevation (ft)	Depth to Groundwater ⁽¹⁾ (ft)	Groundwater Elevation (ft)	Recorded Total Depth (ft)
MW-1	910.26	*		15.30
MW-9	891.60	21.05	870.55	28.08
MW-10	874.04	21.58	852.46	28.30
MW-15	873.80	20.93	852.87	51.39
MW-24	874.27	14.10	860.17	37.94
MW-28	875.83	19.52	856.31	43.38
MW-30	876.06	15.88	860.18	41.06
MW-31	885.78	18.33	867.45	48.29
MW-34	915.07	26.52	888.55	38.60
MW-45	863.22	12.90	850.32	19.24
MW-47	867.97	15.10	852.87	45.57

⁽¹⁾ - Measurement of the depth to groundwater from the top of casing

* - MW-1 was dry



Groundwater
Potentiometric Surface Map
September 24, 2007 -
AZS Chemical Site
Atlanta, Fulton County, Georgia



Scale (Feet)



PART ONE

Attachment C

The field inspector and the enforcement official will meet and complete four tasks. Those tasks are 1) review enforcement and permitting actions taken to date at the facility, 2) review the owner/operator's sampling and analysis program, 3) review the owner/operator's O&M program, and 4) prepare site-specific inspection objectives.

1. Facility identification number GAD981237225
2. Name of facility contact Chuck Hill - Dobbs Environmental
phone number (770) 786-2338 or 770 458-7070 cell # 404-557-9585
3. Address of facility 762 Marietta Blvd
Atlanta, GA 30318

4. Does the facility have: NO
- Interim Status (go to 5a)
- detection monitoring
 - assessment monitoring
 - corrective action (§3008(h))

- Permit Status (go to 5b) YES
- detection monitoring
 - compliance monitoring
 - corrective action

5a. Past actions taken at facility (interim status)

Type	Date(s)
Operation and Maintenance Inspection	_____
Comprehensive (Ground-Water)	_____
Monitoring Evaluation	_____
Case Development Inspection	_____
RCRA Facility Assessment	_____
Compliance Evaluation Inspection	_____
Ground-Water Task Force Investigation	_____

Complete the following questions in regard to the actions listed on the previous page:

- Do you have a copy of completed inspection reports or site studies? Yes ____ No ____
- For each, summarize deficiencies identified in the owner/operator's sampling program and/or the owner/operator's operation and maintenance program.

Go to 6a.

5b. Actions taken at the facility (permit status)

Type

Date

- Permit Issuance
- Operation and Maintenance Inspection
- Comprehensive (Ground-Water)
- Monitoring Inspection
- Case Development Inspection
- Compliance Evaluation Inspection
- Other

Complete the following in regard to the actions listed above:

- Do you have a copy of the permit and copies of inspection reports completed after permit issuance? Yes ____ No ____
- Summarize deficiencies identified after permit issuance regarding the owner/operator's operation and maintenance program.

Go to 6b

6a. Identify enforcement actions issued to the facility in regard to interim status violations.

Action

Date(s)

- §3008(a) complaint/order
- §3013 complaint/order
- §3008(h) complaint/order
- §7003 complaint/order
- Referral for litigation
- Other

Complete the following regarding the actions listed above:

- For each, identify if the enforcement action is focused on the owner operator's sampling and analysis program and/or the owner/operator's operation and maintenance program. Summarize relevant requirements imposed on the owner/operator.

Go to 7

6b. Identify enforcement actions issued to the facility after the permit issuance date.

<u>Action</u>	<u>Date(s)</u>
• §3008(a) complaint/order	_____
• §3013 complaint/order	_____
• §3008(h) complaint/order	_____
• §7003 complaint/order	_____
• Referral for litigation	_____
• Other	_____

Complete the following regarding the actions listed above:

- For each, identify if the enforcement action focused on the owner/operator's sampling and analysis program and/or the owner/operator's operation and maintenance program. Summarize relevant requirements imposed on the owner/operator.

Go to 7

7. Review and summarize the owner/operator's sampling and analysis plan. (Note: Revise or add to the table if permit conditions dictate a different requirement the owner/operator must follow.) Does the Sampling and Analysis Plan: <i>Sept 04 Part B Table 35</i>	Y/N
Include provisions for the measurement of static water elevations in each well prior to each sampling event?	Y
Specify the device to be used for measuring water level elevations?	Y
Specify the procedure for measuring water levels?	Y
Provide for the measurement of depth to standing water and depth to the bottom of the well to 0.01 feet?	Y
Explain whether dedicated or non-dedicated sampling equipment is used and the type of sampling equipment? <i>Disposable</i>	
Describe procedures for evacuating wells?	Y
Provide for the use of sampling devices constructed of inert materials such as fluorocarbon resin or stainless steel?	N
Provide for dedicated sampling devices for each well or alternately provide for decontamination of sampling devices and the collection of blanks between wells? <i>Disposable</i>	
Provide for the collection and containerization of samples in the order of volatilization potential?	Y
Identify the preservation methods and sample containers the owner/operator will use?	Y
Describe procedures for transferring samples to off-site laboratories?	Y
Describe a chain-of-custody program which includes the use of sample labels, sample seals, field logbooks, chain-of-custody records, sample analysis request sheets, and laboratory logbooks?	Y
Include provisions for collection of field, trip, and equipment blanks?	Y
Include an inventory of sampling equipment and sampling devices used as part of the monitoring program?	N
Include detailed operating, calibration, and maintenance procedures for each sampling device?	N

(Continued)

O&M Inspection Guide...B-6

(Continued from previous page)	Y/N
Include maintenance schedules for sampling equipment? (Refer to Appendix D for discussion of maintenance techniques for gas bladder pumps.)	N
Include decision criteria to be used to replace or repair sampling equipment and/or monitoring wells?	N
*Describe in detail sample handling procedures in place at the owner/operator's laboratory (refer to RCRA Laboratory Audit Inspection Guide for more detail)?	
*Describe in detail the procedures that will be used to perform analyses in the owner/operator's laboratory (refer to RCRA Laboratory Audit Inspection Guide for more detail)?	
*Describe in detail quality assurance/quality control procedures in place? (refer to RCRA Laboratory Audit Inspection Guide for more detail.)	

***NOTE:** *The RCRA Laboratory Audit Inspection Guide (RCRA Ground-Water Monitoring Systems)* describes the information the owner/operator should include in the Sampling and Analysis Plan regarding the owner/operator's laboratory program. The inspector may want to supplement the checklist in this manual with the checklist in the *RCRA Laboratory Audit Inspection Guide* while planning an operation and maintenance inspection.

Go to 8

COMMENTS ON SAMPLING AND ANALYSIS PLAN

8. Complete the following table. Use a separate entry for each well and piezometer in the monitoring system:

Identification Number	Type of Well Sampling Equipment (pump or bailer)	Depth to Water Last Inspection (if available)	Depth to Bottom Last Inspection (if available)	Notes/Comments
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				
11.				

After working through Part One, the enforcement official and the field inspector should know:

- the number and location of monitoring wells and piezometers at the facility;
- the procedures and techniques the owner/operator uses to collect ground-water samples;
- the details of the owner/operator's operation and maintenance program in-place at the facility; and
- the existence and nature of any permitting or enforcement action which may affect the field inspection.

The inspector will need the following equipment to conduct the field inspection:

- facility map with locations of wells and piezometers
- bound field notebook
- camera
- weighted tape measure or electronic water level indicator (made of inert material),
- deionized water, hexane (or laboratory strength cleaner), and sterile, disposable paper towels or gauze for decontamination of tape measure or probe
- surveyor's chain

(Note: additional equipment will be needed if the inspector wishes to obtain a split sample from the owner/operator.)

APPENDIX B
Part Two

Field Inspection Guide

PART TWO

The field inspector will complete four tasks during the field inspection. They are:

1) review the operating record to identify evidence of deficiencies in the owner/operator's sampling and/or operation and maintenance programs; 2) visually inspect each well and piezometer for evidence of damage or deterioration; 3) obtain measurements from the operations record of depths of water levels and well depths for each well and piezometer; and 4) visually observe the owner/operator's field crew as they collect ground-water samples.

Name of inspector(s) Penny Gayner / Tom Brodell

Date(s) of inspection 9/24/07 : 9/27/07

1. Review the operating record of the facility. Does the operating record:	Y/N
Include annual reports of ground-water monitoring results including ground-water level data from each well and piezometer in the monitoring system?	Y
Include an inventory of all sampling devices and purging equipment in use at the facility and information on model number, serial number and manufacturers name?	N ^{Disposable Bailers}
Include detailed operating, calibration and maintenance procedures for each sampling device?	N
Describe decision criteria to be used to replace or repair sampling equipment and/or monitoring wells?	N
Include schedules for performing operation and maintenance activities related to the ground-water monitoring system?	Y _{monthly inspection}
Include records for ground-water monitoring which provide information on 1) the date, exact place and time of sampling or measurements; 2) the individual(s) who performed the sampling or measurements; 3) the date(s) analyses were performed; 4) the analytical techniques or methods used; and 5) the results of such analyses?	Y
Include records of all monitoring information including all calibration and maintenance records?	N _{Disposable}
Include records of monitoring information including determination of ground-water surface elevations?	Y
Include a determination of ground-water flow rate and direction(s) in the uppermost aquifer on an annual basis (e.g., prepare a potentiometric map annually using data collected during the year)?	Y
Provide for more frequent and intensive inspection of wells constructed of non-inert casing such as PVC? (Refer to Appendix A for permit example.)	N

COMMENTS ON OPERATING RECORD

2. Visually inspect each well and piezometer and complete the table below (one line entry for each well or piezometer):

[illegible]

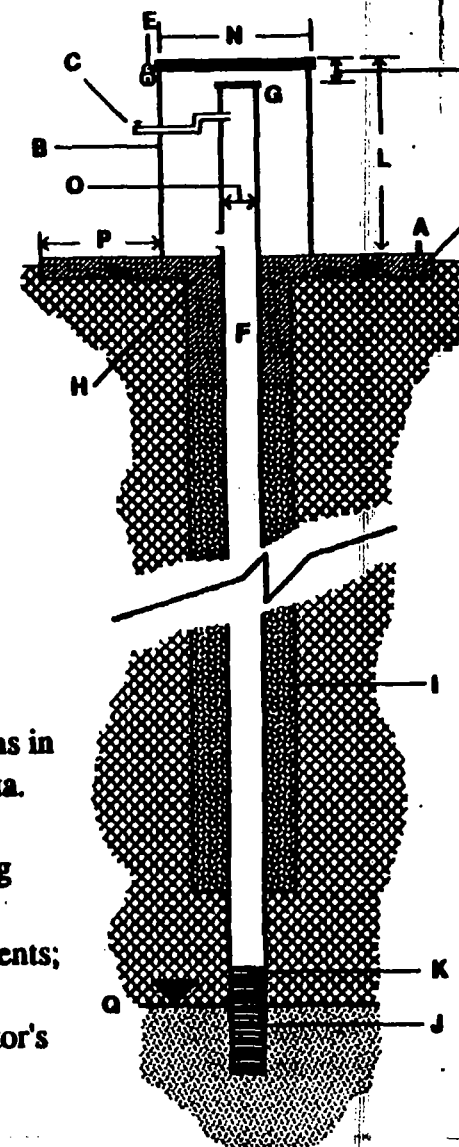
3. Obtain data on depth to standing water and depth to the bottom of each monitoring well and piezometer in the owner/operator's monitoring system. Record depth measurements to the nearest 0.01 feet. Record the measurements

[illegible]

Key:

- A - survey elevation mark
- B - protective outer casing
- C - gas vent
- D - concrete apron
- E - fitted lock
- F - primary casing material
- G - cap for primary casing
- H - bore hole seal
- I - annular space seal
- J - well screen
- K - filter pack
- L - height of riser
- M - elevation difference
- N - diameter of outer casing
- O - diameter of primary casing
- P - radius of apron
- Q - water level below surface

1. The field inspector has several options in collecting ground water elevation data. The inspector may:
 - a. obtain past data from the operating record;and/or
 - b. take his/her own depth measurements; and/or
 - c. obtain data from the owner/operator's sampling crew.



Facility was not sampling
at the time of the inspection.

4. Observe the owner/operator's staff as they collect ground-water samples at several wells. Complete the following table for each well (Note: revise or add to the table if permit conditions dictate a different requirement the owner/operator must follow):

Position/Title	Name	Sampling Experience (years and type)

Well Identification Number _____	Y/N	Photograph Taken Y/N
Did the sampling crew measure static water levels in the well and well depths prior to the sampling event?		
Did the sampling crew use a steel tape or electronic device to take depth measurements?		
Did the sampling crew record depths to +/- 0.01 feet?		
Did the sampling crew follow these procedures: 1. remove locking and protective cap; 2. sample the air in the well head for organic vapors; 3. determine the static water level; and 4. lower an interface probe into the well to detect immiscible layers.		
If immiscible samples were collected, were they collected prior to well purging?		
Did the sampling crew evacuate low yielding wells to dryness prior to sampling?		
Did sampling crew evacuate high yielding wells so that at least three casing volumes were removed?		
Did the sampling crew collect the purge water for storage and analysis or for shipment off-site to a RCRA treatment facility?		
Were sampling devices constructed of fluorocarbon resins or stainless steel?		

Well Identification Number _____	Y/N	Photograph Taken Y/N
If the sampling crew used dedicated samplers, did they disassemble and thoroughly clean the devices between samples?		
<p>-----</p> <p>If samples are collected for organic analyses, did the cleaning procedure include the following steps:</p> <ol style="list-style-type: none"> 1. non phosphate detergent wash 2. tap water rinse 3. distilled/deionized water rinse 4. acetone rinse 5. pesticide-grade hexane rinse? <p>-----</p>		
<p>If samples are collected for inorganic analyses, does the cleaning procedure include the following steps:</p> <ol style="list-style-type: none"> 1. dilute acid rinse (HNO₃ or HCL) 2. distilled/de-ionized water rinse? 		
Did the sampling crew take trip blanks, field blanks and equipment blanks?		
If the sampling crew used bailers, were they bottom valve bailers?		
If the sampling crew used bailers, was "teflon" coated wire, single strand stainless steel wire or monofilament used to raise and lower the bailer?		
If the sampling crew used bailers, did they lower the bailer slowly to the well?		
If the sampling crew used bailers, were the bailer contents transferred to the sample container to minimize agitation and aeration?		
Did the sampling crew take care to avoid placing clean sampling equipment, hoses, and lines on the ground or other contaminated surfaces prior to insertion in the well?		
<p>If the sampling crew used dedicated bladder pumps:</p> <p>Was the compressed gas from an oilless compressor certified quality commercial compressed gas cylinder? If not, was a suitable oil removal purification system installed and maintained?</p> <p>-----</p>		
Was the bladder pump controller capable of throttling the bladder pump discharge flow to 100 mi/min or less for continuous periods of at least 20-30 seconds without restricting liquid discharge?		

(Continued)

Well Identification Number _____	Y/N	Photograph Taken Y/N
Were samples taken from the bladder pump discharge tube, and not from any purge device discharge tube?		
Was the bladder pump discharge flow checked for the presence of gas bubbles before each sample collection, as a test for bladder integrity?		
Was bladder pump flow performance monitored regularly for dropoff in flow rate and discharge volume per cycle?		
Was the bladder pump incorporated in a combination sample-purge pump design which can expose the bladder pump interior and discharge tubing to the pump drive gas? If so, were operating procedures established and followed to prevent at all times the entry of drive gas into the sample flow or into the bladder pump interior?		
Did the sampling crew collect and containerize samples in the order of the volatilization sensitivity of the parameters?		
Did the sampling crew measure the following parameters in the field: pH, temperature, specific conductance?		
Did the sampling crew sample background wells before sampling downgradient wells?		
Did the sampling crew use fluorocarbon resin or polyethylene containers with polypropylene caps for samples requiring metals analysis?		
Did the sampling crew use glass bottles with fluorocarbon resin-lined caps for samples requiring metals analysis?		
If metals were the analytes of concern, did the sampling crew use containers cleaned with nonphosphate detergent and water, and rinsed with nitric acid, tap water, hydrochloric acid, tap water and finally Type II water?		
If organics were the analytes of concern, did the sampling crew use containers cleaned with nonphosphate detergent, rinsed with tap water, distilled water, acetone, and finally pesticide quality hexane?		
Did the sampling crew filter samples requiring analysis for organics?		

COMMENTS ON SAMPLING PROGRAM

After working through Part Two, the field inspector will have:

- assessed whether the owner/operator's sampling crew departed from written sampling and analysis procedures as contained in the owner/operator's sampling and analysis plan (interim status) or in the owner/operator's RCRA permit (permit status);
- identified deficiencies in the way the owner/operator's sampling crew collected ground-water samples;
- identified deficiencies in the owner/operator's program to ensure on-going maintenance of sampling devices and monitoring wells/piezometers;
- identified deficiencies in the owner/operator's operating record (Does the operating record have all the information in it that is required?); and
- collected field data that will allow the enforcement official to construct potentiometric maps and assess the viability of individual wells.

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Drive, SE, Suite 1154E, Atlanta, Georgia 30334-9000

Noel Holcomb, Commissioner

Environmental Protection Division

Carol A. Couch, PhD., Director

Hazardous Waste Management Branch

Phone 404-656-7802 FAX 404-651-9425

FILE COPY

October 11, 2007

TRIP REPORT

Site Name and Location:

AZS Corporation
762 Marietta Boulevard
Atlanta, Fulton County, GA 30318

EPA I. D. Number:

GAD981237225

Trip by:

Thomas J Brodell, QEP, Environ. Engineer

Dates of Trip:

September 24, 2007 – On-Site Inspection
September 27, 2007 – Records Review

Accompanied by:

On Site:

Penny Gaynor, Geologist

John Fonk, Unit Coordinator, Remedial Sites Unit

Becky Ferguson, Geologist, Remedial Sites Unit

Rick Hardy, Geologist, Remedial Sites Unit

Records Review

Penny Gaynor, Geologist

Officials Contacted:

Chuck Hill, Geologist, Dobbs Environmental

Denny Dobbs, President, Dobbs Environmental

Reference:

Permit HW-051(D)

Comments:

The purpose of this trip was to conduct the Federal Fiscal Year 2007 Compliance Evaluation Inspection (CEI), Operations and Maintenance (OAM) Inspection and Corrective Action Compliance (CAC) Inspection at the AZS Corporation facility. This report addresses only the CEI portion of the visit, and Penny Gaynor addresses the OAM and CAC Inspections in a separate report. Both reports, however, reference the Photo Log attached to this report.

The AZS facility is closed and no buildings exist on-site other than a single open-sided shack for the groundwater treatment system equipment, and several shacks built and occupied by indigents living on the site.

Prior to 1972, the site was operated as a specialty organic chemical manufacturing facility from the early 1900s. In 1972 the Seydel-Woolley & Co. merged with AZ Products and became AZS Chemical Company, Div. of AZS Corporation.

AZS possessed a Hazardous Waste Facility Permit No. HW-051 (D), which expired on September 30, 1997, for post closure care of five inactive out-of-service impoundments. Four of these impoundments (the Neutralization, Settling, Skimming and Abandoned Surface

Impoundment) were coupled together and regulated collectively as one regulated unit called the Series Pond Area. The fifth impoundment was regulated as a second regulated unit called the Polymer Pond.

In both of these units, AZS disposed of F002, F003 and F005 hazardous wastes. Because it was not feasible to remove all of the hazardous waste from the Polymer and Series Ponds prior to closure, both waste management units were closed in June 1987 as hazardous waste landfills.

The corrective action program, a pump and treat system, is currently focused on the remediation of the groundwater contaminants associated with the closed Series Ponds. The pump and treat system consists of three recovery wells and a carbon treatment system. A fourth recovery well exists for the Polymer Pond, however, is no longer in use.

Upon arriving at AZS, Mr. Chuck Hill met us at front gate. The CEI portion of the visit began with a site tour concurrent with the OAM and CAC inspections. The records review was conducted three days later at the offices of Dobbs Environmental.

Inspection/Observations:

The facility is occupied by several indigents who have built shelters on-site to live in. One shelter is present approximately 15 yards from the background monitoring well, and the area of the well is used as a restroom facility (see Photo #s 01 – 02).

The cap of the closed Polymer Pond unit could not be adequately inspected due to overgrowth. There were, however, several issues observed:

1. The top of the surface impoundment unit has not been mowed for several months. Grass is thigh- to chest-high depending upon the area of the cap that one stands upon. (see Photo #s 10 – 14).
2. A chemical transport hose was observed attached to a submerged pipe immediately adjacent to (or perhaps on) the cap (see Photo #s 15 – 17).
3. Trees were observed growing on the cap (see Photo #s 18 – 19). The boundary of the cap was determined on-site by comparing physical landmarks to Figure 9 of the 2004 Permit Application. Later office review of Figure 3457-02 of the 1987 Permit Application, Figure 12 of a 1994 Semi-Annual Report by Hazwaste Industries, Inc., and Figure 4 of the 2000 Permit Application support the determination. Upon arrival at the cap, Mr. Hill indicated that a ditch marked the boundary of the cap, as indicated on all three documents mentioned here. However, when the trees were pointed out as being on the cap, he attempted to indicate that the cap ended at a point that would result in the trees being considered outside the cap boundaries.
4. Walking on the cap, several depressed areas were felt underfoot.

The cap of the closed Series Pond unit also could not be adequately inspected due to overgrowth. There were, however, several issues observed:

1. The top of the unit has not been mowed for several months. Grass is knee- to waist-high depending upon the area of the cap that one stands upon. (see Photo #s 37 – 42).
2. The boundaries of the cap could not be ascertained with any certainty while on-site. Determination of the cap's boundary was attempted on-site by comparing physical

landmarks to Figure 9 of the 2004 Permit Application. Due to overgrowth and lack of clear physical landmarks or the maintenance of benchmarks, the cap's boundaries are not clear-cut. Later office review of Figure 3457-01 of the 1987 Permit Application Figure 12 of a 1994 Semi-Annual Report by Hazwaste Industries, Inc., and Figure 4 of the 2000 Permit Application did not provide necessary clarification of the cap's boundaries.

3. Small brush was observed at the edges of the cap. It could not be ascertained whether this brush was within or outside of the boundaries of the cap.
4. A walking path was clearly worn into the grass at the eastern end of the cap (see Photo # 39 for location of path).
5. According to Mr. Hill, United Real Property Investments, LLC (United Real Property), the owner of the majority of the site, engaged in soil boring in 2004 and altered the surface water flow in the area of the walking path, thereby allowing additional water to flow onto the cap. Review of the Inspection Logs, during the Records Review, however, indicated that United conducted soil excavations, not borings.

Security at the site was observed to be non-existent, and access to the site is unrestricted, based upon the following observations:

1. There were no signs observed warning against trespassing or entry. The only signs observed were three signs stating "Authorized Personnel Only" posted on the structure of the open-sided shelter housing the groundwater treatment system (see Photo # 24).
2. A walking path was clearly worn into the grass at the eastern end of the cap on the Series Pond (see Photo # 39 for location of path).
3. At least two semi-permanent encampments by indigents were observed on the site (see Photo # 2). According to Mr. Hill, a third encampment exists on-site.
4. EPD Inspectors encountered at least four individuals walking through the site during the inspection.
5. Holes were observed in the fence at the front entrance of the facility, and the fence under the new GA Power transmission line was buried under the fill brought in to allow access by GA Power vehicles to the right-of-way (see Photo #s 33 – 34). According to Mr. Hill, upon his arrival at the site, he found the lock and chain on the gate had been previously removed.
6. At the time of the inspection, the groundwater treatment system was not operational due to the theft of the copper wiring powering the system. According to Mr. Hill, the wiring was stolen around the beginning of the month.

Seven drums were observed on-site, five of them apparently filled with solids (see Photo #s 03, 04, 21, 22, 43, 44 and 45). One drum (see Photo # 43) exhibited clear evidence of corrosion and salt formation on the outside of the drum. Except for one drum, no labeling was observed, and the one labeled drum was illegible. These drums were all observed on areas of the facility owned by United Real Property. According to Mr. Hill, United Real Property conducted soil borings in 2004, and he believed the drums might be from that activity. Review of the Inspection Logs, during the Records Review, however, indicated that United conducted soil excavations, not borings.

Office Observations:

Dobbs Environmental, at its Covington offices, maintains the AZS Corporation operating record required by the permit. Upon arrival at the Dobbs Environmental Offices on Thursday, September 27th, and presentation of credentials, review of these records was conducted.

The RCRA Part B Permit Application, Permit HW-051(D), the operating log, inspection logs, and proof of financial assurance were reviewed.

Inspection logs for 2005 through 2007 were reviewed and the following issues found:

1. The logs show the most recent inspection prior to the EPD inspection was conducted on August 14, 2007. The inspection log for that date states that six monitoring wells were inspected (MW-5, MW-6, MW-31, MW-32, MW-33, and MW-34) and found in "good" condition. The inspection log lacks any notation that the locks to all wells were removed during that inspection (as communicated by C. Hill during the EPD site visit on Sept. 24). The EPD's site inspection reveals locks were observed to be missing on every well observed.
2. From May 1, 2006 to the most recent inspection, all inspection logs have the following pre-printed statements:
 - a. "Inspector (Name/Affiliation): CSHill (Dobbs)"
 - b. "Polymer CAP is in good condition no erosion etc."
 - c. "Carbon Filtration OVA Reading: 0 ppm".
 - d. "Perimeter Fence As usual fence and gates have holes where homeless cut through property."
 - e. "Warning Signs Yes", and
 - f. Gates & Locks Main gate (auto gate) is locked"

Other items are handwritten, and appear to be in the same handwriting on all inspection logs for this time frame.

The EPD's site inspection, however, reveals:

- a. the Polymer CAP is not in good condition (see Photo #s 10 through 18) and could not have been adequately inspected during the most recent inspection.
 - b. No other proof of the inspections being performed was available in the records.
 - c. No documentation of attempts to fix the Perimeter Fence was available in the records.
3. From January 1, 2005 through April 5, 2005, all inspection logs state the "Series CAP is receiving storm water from United's soil excavation areas above MW-13. This has eroded the bank near MW-13 and above the Series Pond. The CAP is very wet due to the excessive run-on from upgradient areas." Similar statements about the Series Pond CAP being wet appear in later 2005 and in 2006. There is no documentation that this run-on of storm water has been corrected.
4. Format of the inspection logs makes it difficult to tell what has actually been inspected, as the logs are not filled out as the form indicates it should be. The current forms also lack the information required under Permit Condition II.J, including the date and nature

of repairs/remedial action for unacceptable items observed during an inspection.
Samples of the logs are attached to this report.

The proof of financial assurance was reviewed. Dobbs Environmental only had the proof of financial assurance submitted with the 1987 permit application. In the 2004 application, a waiver was requested and no financial assurance instrument was included in the application. Currently, EPD files indicate AZS secures its financial assurance through a \$500,000 non-revocable letter of credit issued by Keybank National Association on Oct. 31, 2005 with a Standby Trust Agreement with Fifth Third Bank. These documents were not in Dobbs' files.

The operating log was reviewed and found to be missing the annual certification that AZS has a waste reduction program in place, as required by Permit Condition I.G.1.

At the conclusion of the inspection we provided an inspection summary to Mr. Hill

Conclusion:

AZS Corporation is in violation of the Rules and their permit. United Real Property Investments, LLC is in violation of the Rules.

**Recommendations
and Follow-up:**

Send Notices of Violation

Photographs:

45

Attachments:

Two (Photo log and Sample Inspection
Logs)

Reviewed by:



Jim McNamara
Unit Coordinator
Land Disposal Unit

File:

AZS (R)

AZS Corporation 2007 CEI Trip Report
October 11, 2007

ATTACHMENT A
Photo documentation

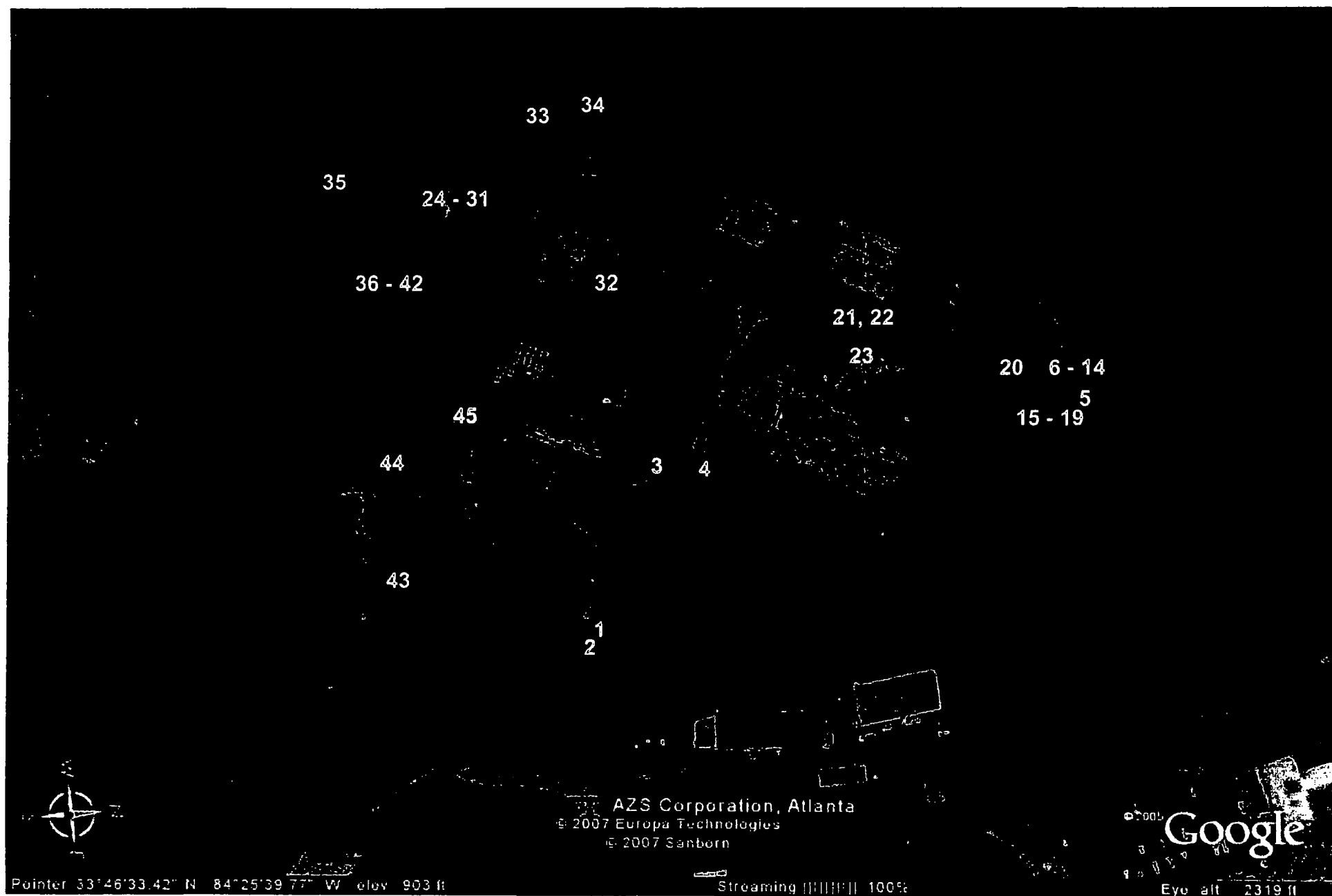


Photo Locations – AZS Corporation – FFY 2007 CEI, CAC & OAM Inspections – September 24, 2007

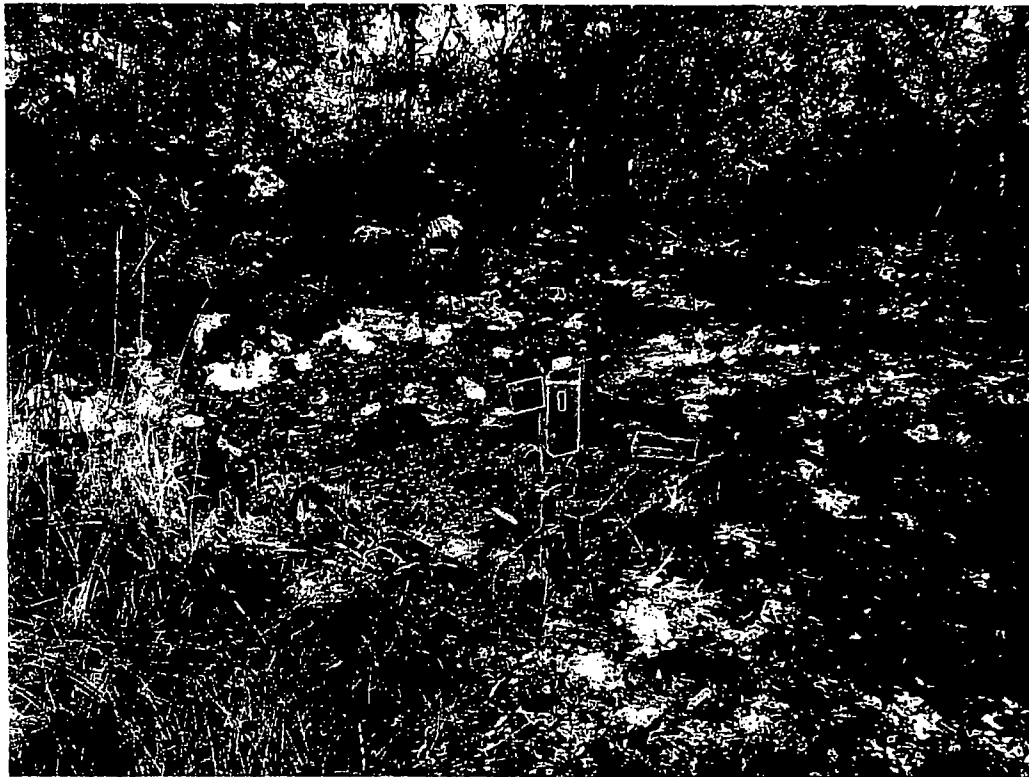


Photo	1 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	MW-1, the designated background well. Currently used as a bathroom facility by indigents living on property as indicated by partially decomposed toilet paper around well. Well found unlocked.						

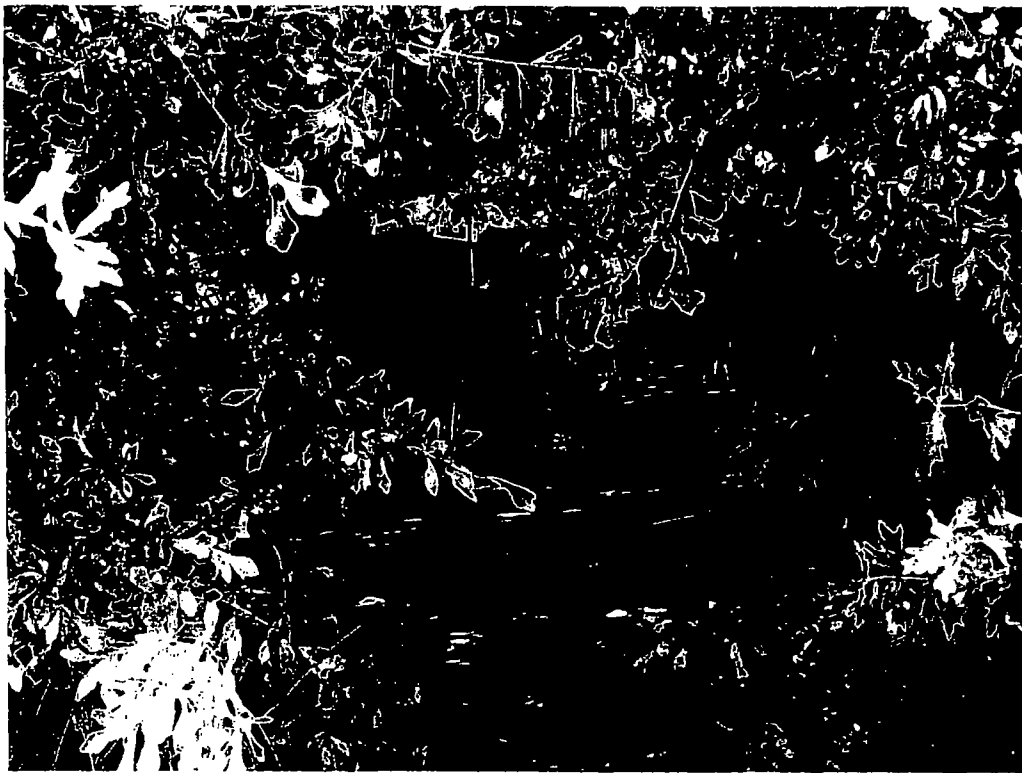


Photo	2 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Indigent squatters camp approximately 15 yards southeast of MW-1 shown in Photo No. 1.						



Photo	3 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Empty 55-gallon Drum near former Railroad Siding between former Truck Lot, former Warehouse and former Tank Car Unloading Transfer Center						



Photo	4 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	55-gallon drum filled with solids approximately 10 yards north of the drum shown in Photo No. 3. Drum located just off of road surface where it changes from asphalt to concrete.						

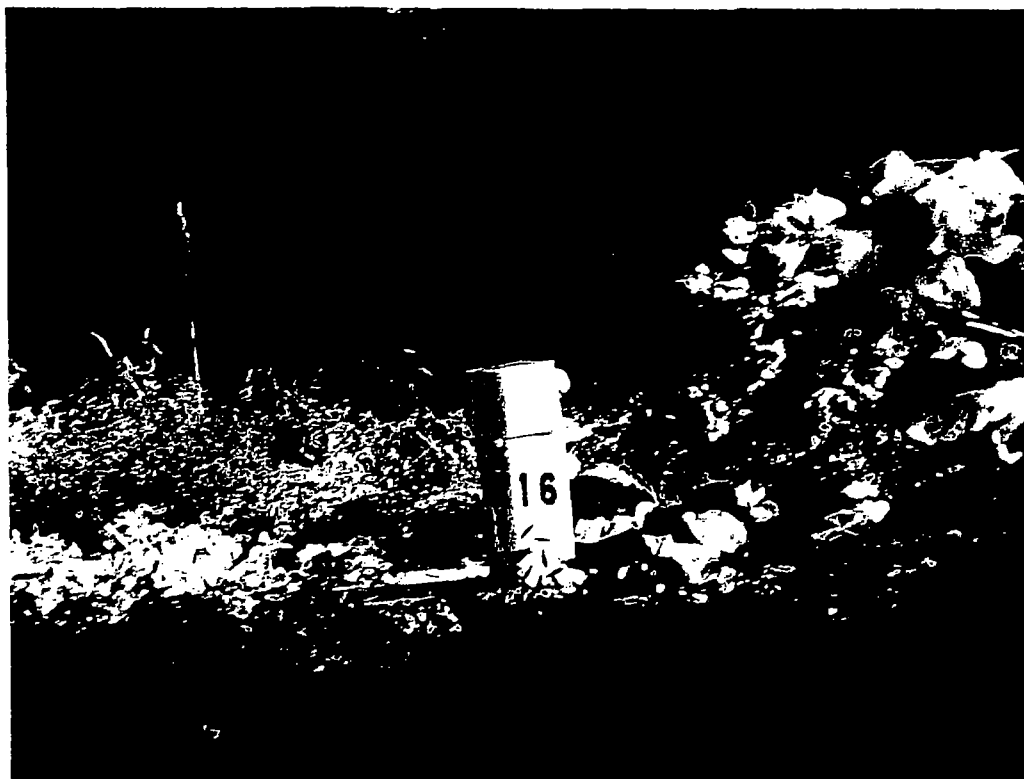


Photo	5 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	MW-16 located cross-gradient of the Polymer Pond. Well was found without a lock. According to Chuck Hill, Geologist with Dobbs Environmental, during his last on-site inspection, he removed all locks with intent to replace all on the next visit.						



Photo	6 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	RW-1 found without lock or well housing cover, located downgradient of Polymer Pond HWMU. Well was not labeled.						



Photo	7 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	MW-24 (foreground) and MW-18(background), downgradient of the Polymer Pond HWMU. Protective Casing Cap for MW-24 found as pictured and unable to close fully. Both wells were found without a lock.						



Photo	8 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	MW-20, point of compliance well for the Polymer Pond HWMU. Well was found without a lock.						



Photo	9 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	PVC piping on ground next to MW-20.						

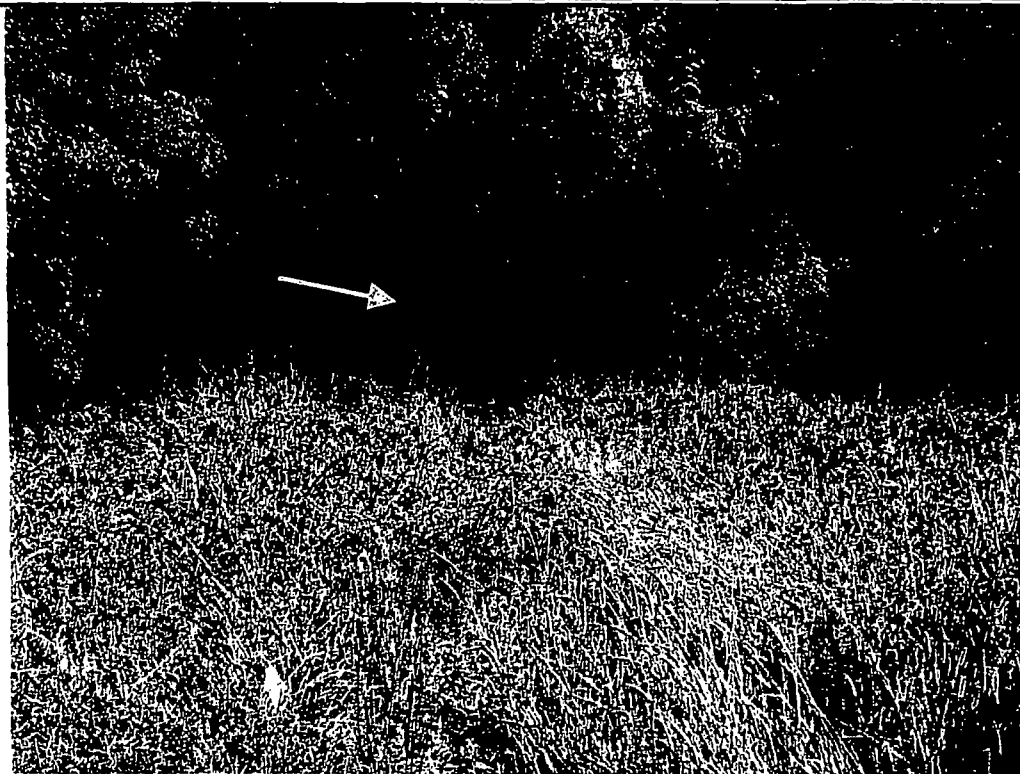


Photo	10 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	First in a panoramic photo series of the Cap on the Polymer Pond HWMU. Photo taken standing on northwestern edge of cap, southeast of MW-20, and facing northeast. Grass is waist- to chest-high in this picture. Arrow points to tree pictured in Photo No. 19						

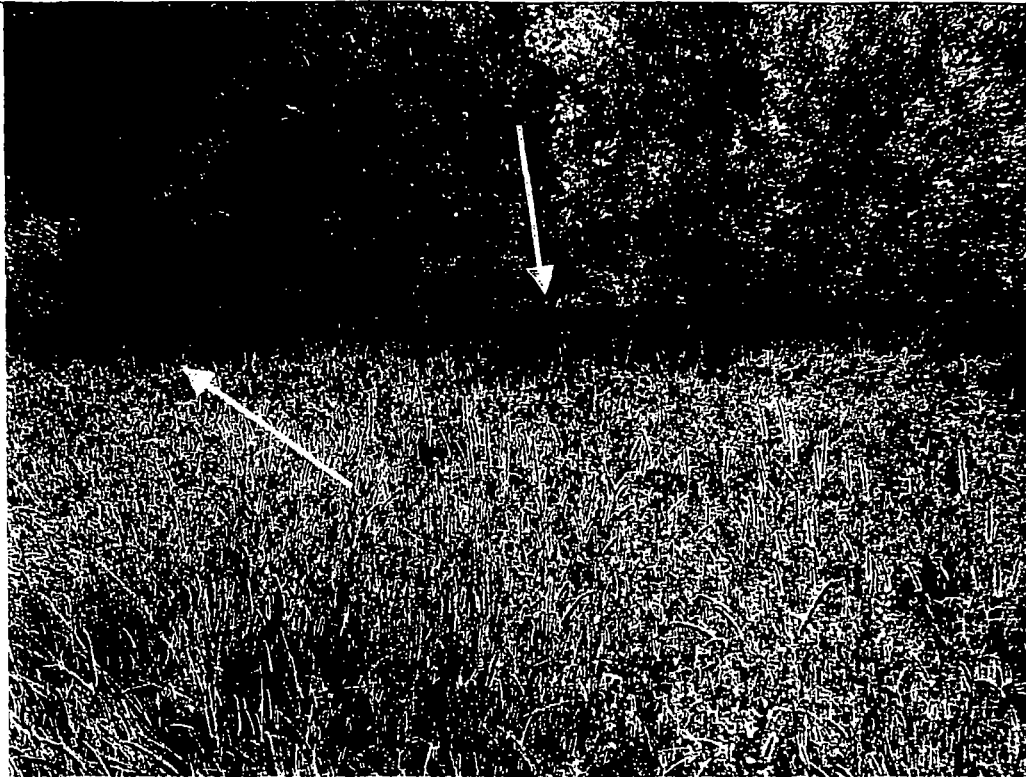


Photo	11 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Second in the panoramic series of the Polymer Pond Cap, turning clockwise from Photo No. 10. Grass observed to be thigh- to waist-high in this photo. Arrow on left points to trees pictured in Photo No. 18 and arrow on right points to chemical transport hose pictured in Photo No. 15.						

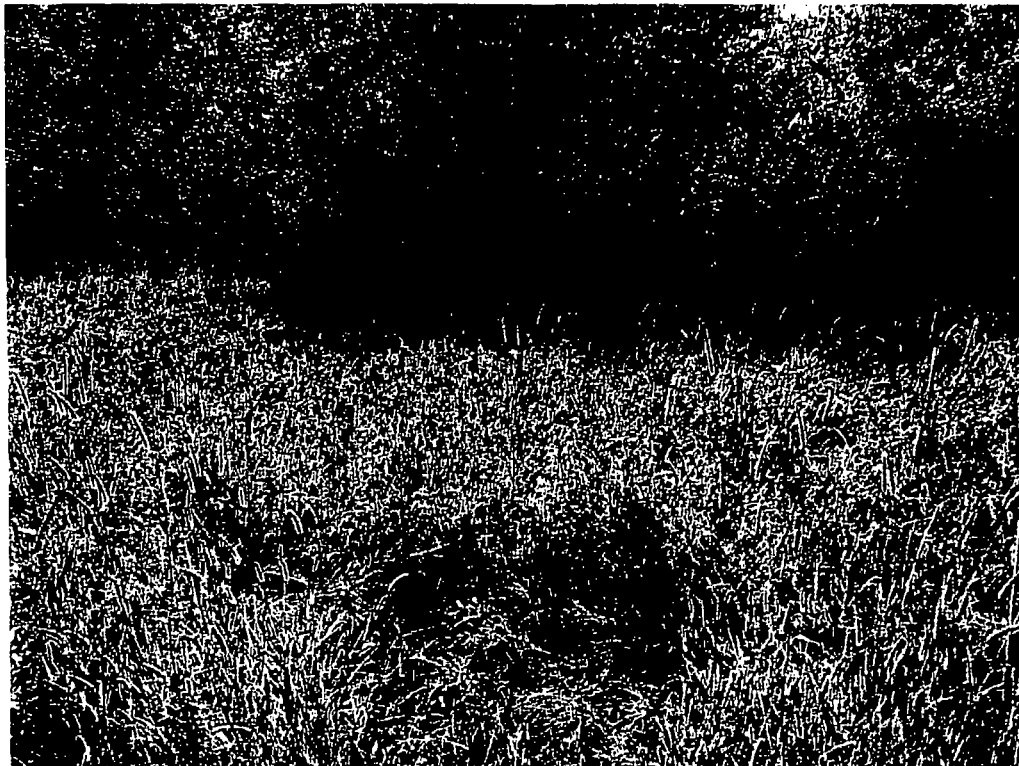


Photo	12 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Third in the panoramic photo series of the Polymer Pond Cap, turning clockwise from Photo No. 11 and facing approximately southeast.						



Photo	13 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Fourth in the panoramic photo series of the Polymer Pond Cap, turning clockwise from Photo No. 12 and facing approximately south.						



Photo	14 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Fifth and last in the panoramic photo series of the Polymer Pond Cap, turning clockwise from Photo No. 13. Grass observed to be waist- to chest-high.						



Photo	17 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Steel pipe on ground surface running along southwestern edge of Polymer Pond Cap. Steel pipe submerges under dirt and leaves near top arrow.						

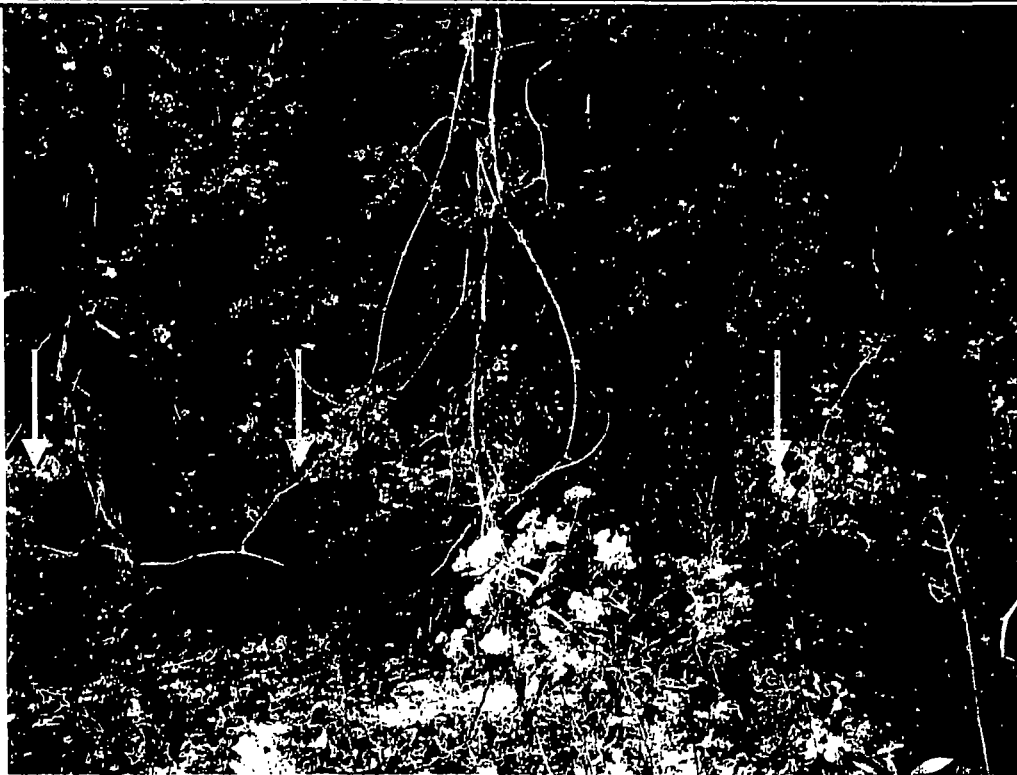


Photo	18 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Trees on Polymer Pond Cap. Arrows point to ditch running behind trees. Figure 5 of 2004 Permit Application identifies ditch as being within boundaries of the cap. Location of trees identified by arrow in Photo No. 11.						



Photo	19 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Tree (identified by arrow) on northeastern corner of Polymer Pond Cap. Ditch running behind tree and in-front of MW-16 in background is identified by Figure 5 of 2004 Permit Application as being within boundaries of the cap						



Photo	20 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	MW-2, Point Of Compliance Well for Polymer Pond. Pad is lifted and damaged. Well and casing above ground is slanted toward right of photo.						

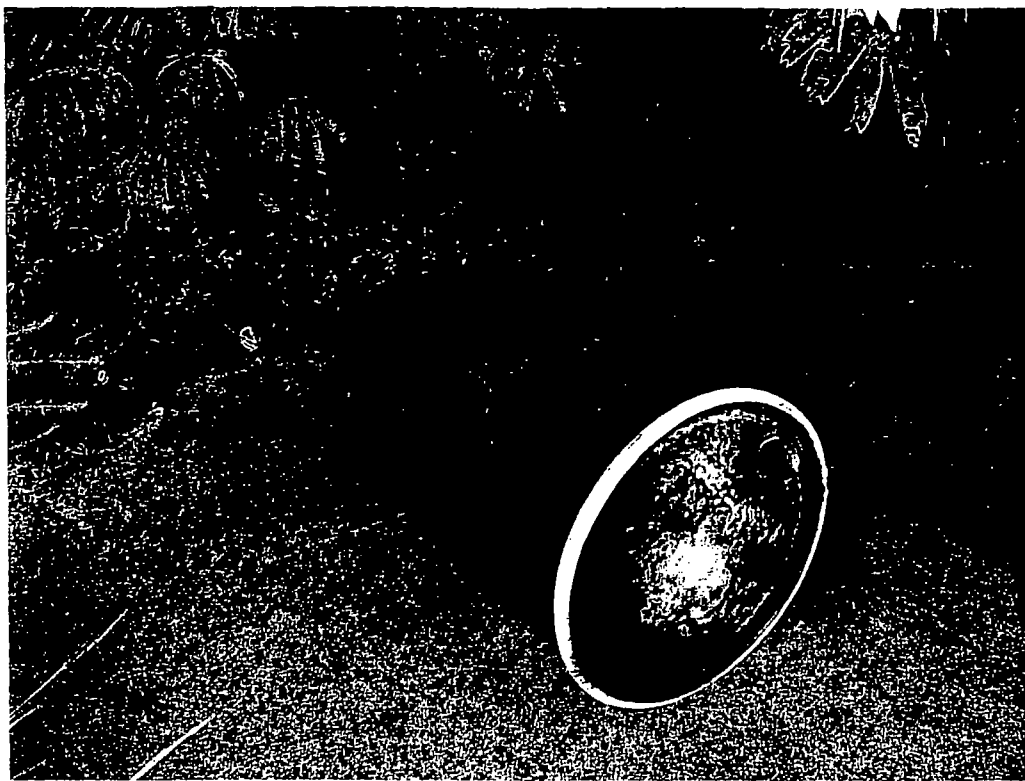


Photo	21 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	55-gallon drum of solids on asphalt roadway between former Laboratory and former Polymer Warehouse. Faded writing on side of drum was undecipherable.						



Photo	22 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Second view of drum pictured in Photo No. 21, looking toward ruins of former Polymer Warehouse.						



Photo	23 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	View from Polymer Warehouse Ramp facing towards former Monomer Tank Farm and Polymer Pond (back left). Picture taken from first concrete pad visible in middle of Photo No. 22.						

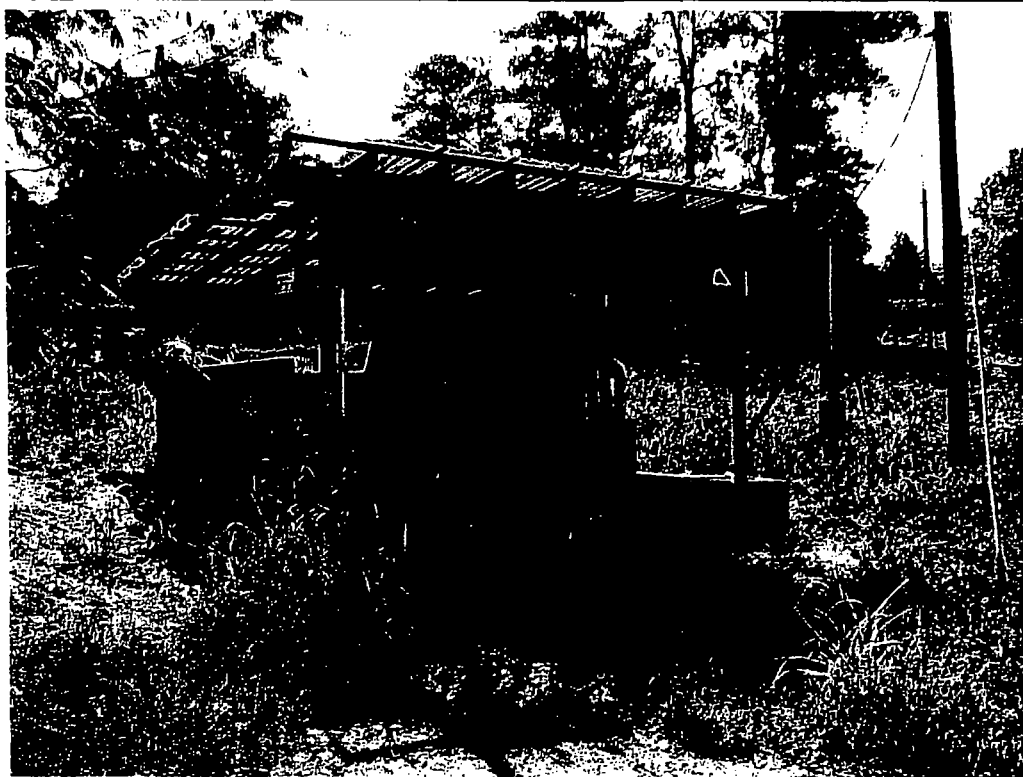


Photo	24 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Groundwater Treatment System posted with signs stating "Authorized Personnel Only". Consultant reports that copper wiring stolen since August 14, 2007 site visit. Meter box in right background. Photo taken facing approximately south.						



Photo	25 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Second view of groundwater treatment system. System is not currently operational due to theft of copper electrical wiring.						

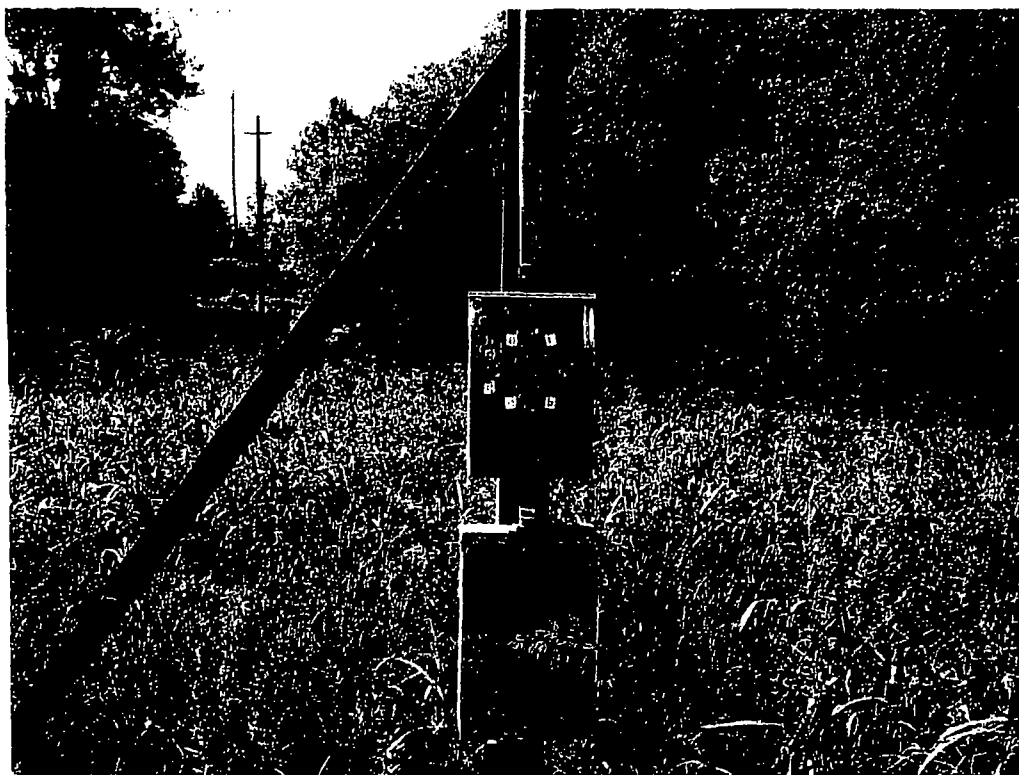


Photo	26 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Meter box for groundwater treatment system. Note absence of any copper wire or parts.						

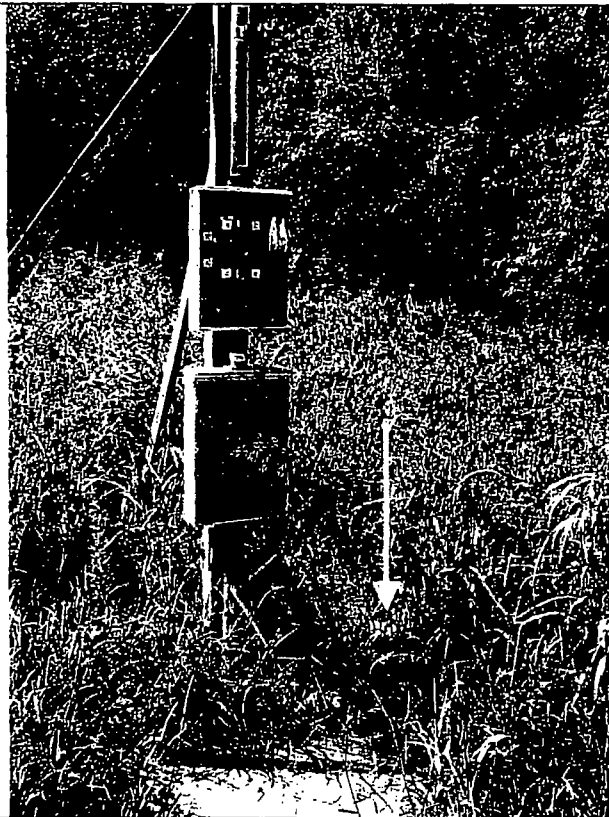


Photo	27 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Meter box for groundwater treatment system. Note electrical meter on ground.						



Photo	28 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	View of groundwater treatment system facing approximately northeast						

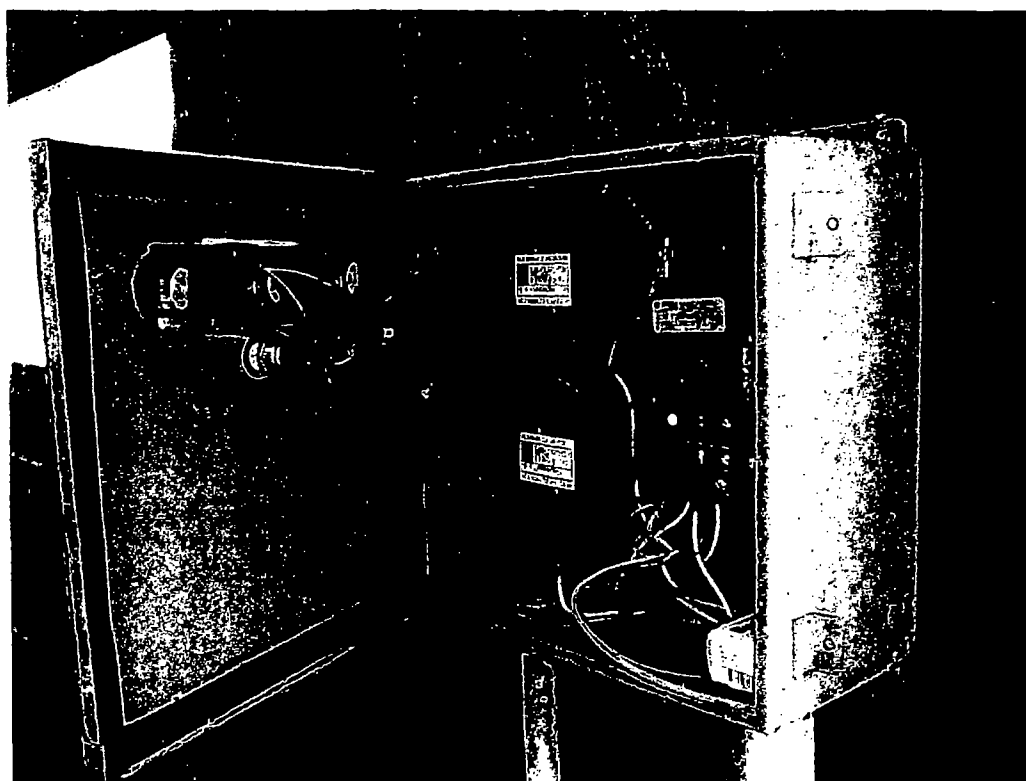


Photo	29 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Inside close-up of switch control box for groundwater treatment system.						



Photo	30 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Sump to collect stormwater contacting groundwater treatment system. Note attempt to repair concrete blocks pulling away from wall. Caulking compound observed to be withered and shrunk. Sump intended to pump stormwater into treatment system.						



Photo	31 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	MW-29, MW-30 and MW-7, Point of Compliance wells for Series Pond, viewed from area of groundwater treatment system facing northern edge of western side of Series Pond Cap. Wells found without locks.						



Photo	32 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	MW-9 at southeastern corner of former Truck Lot, found without lock.						



Photo	33 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Fence at western boundary of facility and south edge of GA Power Transmission Line Right-of-Way. Fence is cut and buried under fill dirt and gravel used to create roadway for access under Right-of-Way.						



Photo	34 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Fence at western boundary of facility south edge of GA Power Right-of-Way. Fence is cut and buried under fill dirt and gravel used to create roadway for access under Right-of-Way.						



Photo	35 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	MW-27 found without lock and without protective casing cap.						

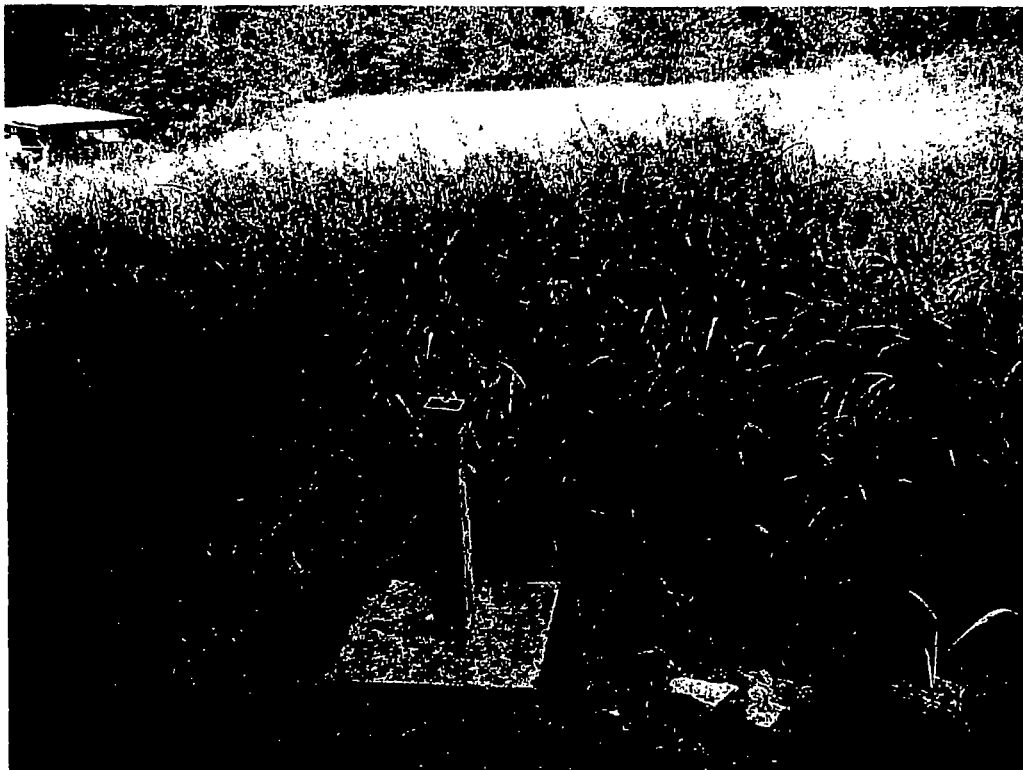


Photo	36 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	MW-31 (foreground) and MW-32 (center of photo) found without locks.						



Photo	37 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	First in a panoramic photo series of the cap on the Series Pond HWMU. Photo taken standing on pad for MW-31, facing approximately northwest. Grass is knee- to waist-high in this picture.						



Photo	38 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Second in a panoramic photo series of the cap on the Series Pond HWMU, turning slightly clockwise from Photo No. 37, and facing the drainage ditch in the middle of the cap. Grass is knee- to waist-high in this picture.						



Photo	39 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Third in a panoramic photo series of the cap on the Series Pond HWMU, turning slightly clockwise from Photo No. 38, Grass is knee- to waist-high in this picture. Arrow points toward start of footpath on cap.						



Photo	40 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Fourth in a panoramic photo series of the cap on the Series Pond HWMU, turning slightly clockwise from Photo No. 39, and facing approximately east.						

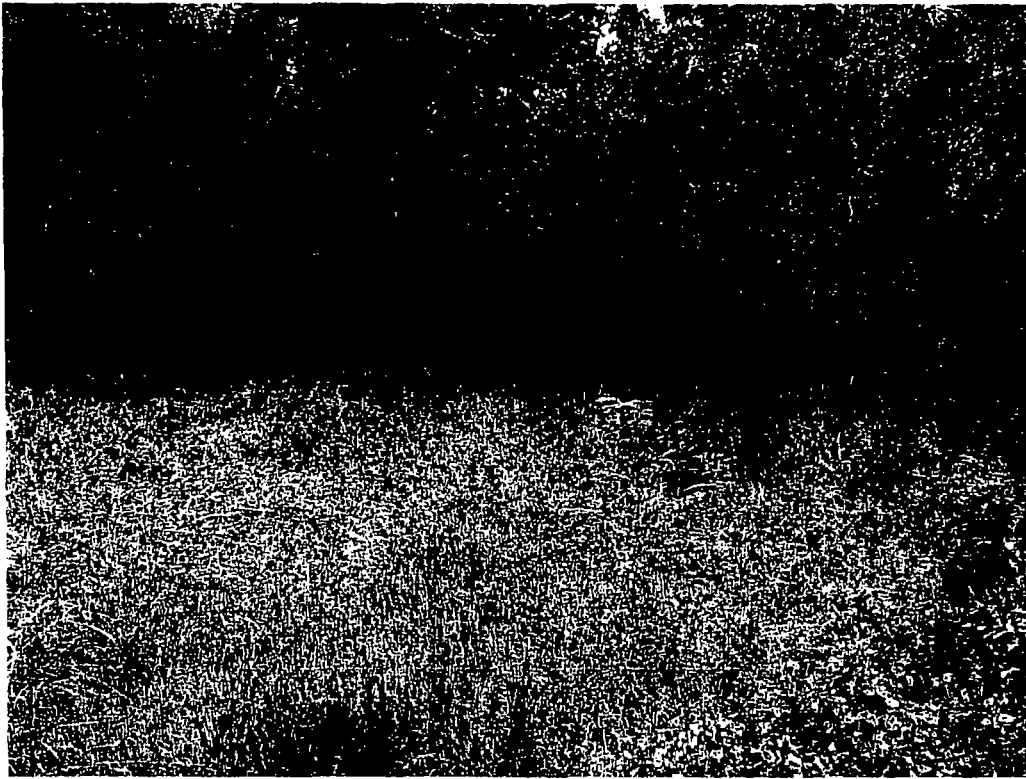


Photo	41 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Fifth in a panoramic photo series of the cap on the Series Pond HWMU, turning slightly clockwise from Photo No. 40. The boundaries of the cap in this view could not be definitively determined from review of Figure 5 of the 2004 Permit Application.						



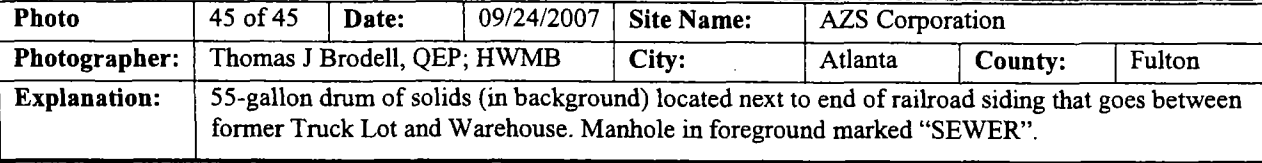
Photo	42 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Sixth and last in a panoramic photo series of the cap on the Series Pond HWMU, turning slightly clockwise from Photo No. 41, and facing generally south. The boundaries of the cap in this view could not be definitively determined from review of Figures 5 of the 2004 Permit Application.						



Photo	43 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	55-gallon drum of solids near the former location of the finishing plant diesel fuel tank. No labeling visible. Note corrosion evident on side of drum with white salt formation.						



Photo	44 of 45	Date:	09/24/2007	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	55-gallon drum of solids near MW-13.						



AZS Corporation 2007 CEI Trip Report
October 9, 2007

ATTACHMENT B
AZS Site Inspection Forms

AZS Corporation 2007 CEI Trip Report
October 11, 2007

ATTACHMENT B
AZS Site Inspection Forms

AZS SITE INSPECTION FORM

Facility ID. No. GAD981237225

DATE: 01-05-05 TIME: 1000-1100

INSPECTOR (Name/Affiliation): CSHill (Dobbs)

MONITOR WELLS: List the monitor wells inspected and mark the appropriate items.

Well No.	Lock	Cover	Concrete Pad	Inner Casing	Notes
		(Ventilation/Weep Holes)			
Example MW-7	No	Good (Yes/Yes)	2' x 2' Good	2" Good w Cap	New Lock
1	RW-2R Yes	Good Condition	Good Condition		
2	RW-3 Yes	Good Condition	Good Condition		
3	RW-4 Yes	Good Condition	Good Condition		
4	MW-7 Yes	Good Condition	Good Condition		
5	MW-29 Yes	Good Condition	Good Condition		
5	MW-30 Yes	Good Condition	Good Condition		

CLAY CAPS: Evaluate the integrity of the caps covering the Polymer and Series Ponds.

Pond.	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
Example	None Noted	Grass no dead or discolored	Rock lined east and south	
	None			
Polymer Pond	Polymer CAP is in good condition no erosion etc.			

Series Pond Series CAP is receiving storm water from United's soil excavation areas above MW-13. This has eroded the bank near MW-13 and above the Series Pond. The CAP is very wet due to the excessive run-on from upgradient areas.

RECOVERY TREATMENT: Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells					
Well No.	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
Example RW-3	Operational	2' x 2' Good	Good Leakin	Repaired Meter	
See above. Treatment System operating Flow Meter : 207,100					

Treatment System

Example Unit	Status	Notes
Effluent	Operational	Collected samples for City (TTO, Nickel, MIBK, pH)
Effluent sample collected for City of Atlanta (TTO, MIBK, pH, Ni)		
Breeze		
Defoamer		
Moisture Traps		
Carbon Filtration		OVA Reading: 0 ppm
Effluent		

OTHER ITEMS: Evaluate the condition of other pertinent site features or items.

Perimeter Fence	As usual fence and gates have holes where homeless cut through property.	
Warning Signs	Yes	
Gate & Locks	Main gate (auto gate) is locked	

AZS SITE INSPECTION FORM
Facility ID. No. GAD981237225

DATE: 02-07-05 TIME: 0830-0930

INSPECTOR (Name/Affiliation): CSHill (Dobbs)

MONITOR WELLS: List the monitor wells inspected and mark the appropriate items.

Well No.	Lock	Cover (Ventilation/Weep Holes)	Concrete Pad	Inner Casing	Notes
Example MW-7	No	Good (Yes/Yes)	2' x 2' Good	2" Good w Cap	New Lock
1	RW-2R Yes	Good Condition	Good Condition		
2	RW-3 Yes	Good Condition	Good Condition		
3	RW-4 Yes	Good Condition	Good Condition		
4	MW-6 Yes	Good Condition	Good Condition		
5	MW-31 Yes	Good Condition	Good Condition		
5	MW-32 Yes	Good Condition	Good Condition		

CLAY CAPS: Evaluate the integrity of the caps covering the Polymer and Series Ponds.

Pond	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
Example	None Noted	Grass no dead or discolored	Rock lined east and south	
Polymer Pond	Polymer CAP is in good condition no erosion etc.			

Series Pond Series CAP is receiving storm water from United's soil excavation areas above MW-13. This has eroded the bank near MW-13 and above the Series Pond. The CAP is very wet due to the excessive run-on from upgradient areas.

RECOVERY TREATMENT: Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells

Well No.	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
Example RW-3	Operational	2' x 2' Good	Good	Leakin	Repaired Meter

See above. Treatment System operating Flow Meter : 308,200

Treatment System

Example Unit	Status	Notes
Effluent	Operational	Collected samples for City (TTO, Nickel, MIBK, pH)
Effluent sample collected for City of Atlanta (TTO, MIBK, pH, Ni)		
Breeze		
Defoamer		
Moisture Traps		
Carbon Filtration		OVA Reading: 0 ppm
Effluent		

OTHER ITEMS: Evaluate the condition of other pertinent site features or items.

Perimeter Fence	As usual fence and gates have holes where homeless cut through property.
Warning Signs	Yes
Gate & Locks	Main gate (auto gate) is locked

AZS SITE INSPECTION FORM

Facility ID. No. GAD981237225

DATE: 03-02-05 TIME: 0830-0930

INSPECTOR (Name/Affiliation): CSHill (Dobbs)

MONITOR WELLS: List the monitor wells inspected and mark the appropriate items.

Well No.	Lock	Cover (Ventilation/Weep Holes)	Concrete Pad	Inner Casing	Notes
Example MW-7	No	Good (Yes/Yes)	2' x 2' Good	2" Good w Cap	New Lock
1	MW-9	Yes	Good Condition	Good Condition	
2	MW-23	Yes	Good Condition	Good Condition	
3	MW-13	Yes	Good Condition	Good Condition	
4	MW-1	Yes	Good Condition	Good Condition	
5	MW-20	Yes	Good Condition	Good Condition	
5	MW-24	Yes	Good Condition	Good Condition	

CLAY CAPS: Evaluate the integrity of the caps covering the Polymer and Series Ponds.

Pond.	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
Example	None	Noted	Grass no dead or discolored	Rock lined east and south
Polymer Pond	Polymer CAP is in good condition no erosion etc.			

Series Pond **Series CAP is receiving storm water from United's soil excavation areas above MW-13. This has eroded the bank near MW-13 and above the Series Pond. The CAP is very wet due to the excessive run-on from upgradient areas.**

RECOVERY TREATMENT: Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells

Well No.	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
Example RW-3	Operational	2' x 2' Good	Good	Leakin	Repaired Meter

See above. Treatment System operating Flow Meter : 384,300

Treatment System

Example Unit	Status	Notes
Effluent	Operational	Collected samples for City (TTO, Nickel, MIBK, pH)
Effluent sample collected for City of Atlanta (TTO, MIBK, pH, Ni)		
Breeze		
Defoamer		
Moisture Traps		
Carbon Filtration		OVA Reading: 0 ppm
Effluent		

OTHER ITEMS: Evaluate the condition of other pertinent site features or items.

Perimeter Fence	As usual fence and gates have holes where homeless cut through property.
Warning Signs	Yes
Gate & Locks	Main gate (auto gate) is locked

AZS SITE INSPECTION FORM
Facility ID. No. GAD981237225

DATE: 04-05-05 TIME: 0900-1000

INSPECTOR (Name/Affiliation): CSHill (Dobbs)

MONITOR WELLS: List the monitor wells inspected and mark the appropriate items.

Well No.	Lock	Cover (Ventilation/Weep Holes)	Concrete Pad	Inner Casing	Notes
Example MW-7	No	Good (Yes/Yes)	2' x 2' Good	2" Good w Cap	New Lock
1 MW-8	Yes	Good Condition	Good Condition		
2 MW-14	Yes	Good Condition	Good Condition		
3 MW-28	Yes	Good Condition	Good Condition		
4 MW-5	Yes	Good Condition	Good Condition		
5 MW-33	Yes	Good Condition	Good Condition		
5 MW-34	Yes	Good Condition	Good Condition		

CLAY CAPS: Evaluate the integrity of the caps covering the Polymer and Series Ponds.

Pond.	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
Example	None	Noted	Grass no dead or discolored	Rock lined east and south
Polymer Pond	Polymer CAP is in good condition no erosion etc.			

Series Pond Series CAP is receiving storm water from United's soil excavation areas above MW-13. This has eroded the bank near MW-13 and above the Series Pond. The CAP is very wet due to the excessive run-on from upgradient areas.

RECOVERY TREATMENT: Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells

Well No.	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
Example RW-3	Operational	2' x 2' Good	Good	Leakin	Repaired Meter

See above. Treatment System operating Flow Meter : 501,100

Treatment System

Example Unit	Status	Notes
Effluent	Operational	Collected samples for City (TTO, Nickel, MIBK, pH)
Effluent sample collected for City of Atlanta (TTO, MIBK, pH, Ni)		
Breeze		
Defoamer		
Moisture Traps		
Carbon Filtration		OVA Reading: 0 ppm
Effluent		

OTHER ITEMS: Evaluate the condition of other pertinent site features or items.

Perimeter Fence	As usual fence and gates have holes where homeless cut through property.
Warning Signs	Yes
Gate & Locks	Main gate (auto gate) is locked

AZS SITE INSPECTION FORM

DATE: 04-28-05 TIME: 0930 INSPECTOR (Name/Affiliation): Charles Hill (Dobbs)

MONITOR WELLS:

List the monitor wells inspected and mark the appropriate items.

Well No.	Lock	Cover	Concrete Pad	Inner Casing	Notes (Ventilation Holes)
Example MW-7	No	Good (Yes/Yes)	2' x 2'	Good 2"	Good w Cap Lock installed

1	MW-20	Yes/Good	Grass needs trimming	Good	
2	MW-1	Yes/Good	Good	Good	
3	MW-23	Yes/Good	Good	Good	
4	MW-24	Yes/Good	Grass needs trimming	Good	
5	MW-13	Yes/Good	Good	Good	

CLAY CAPS:

Evaluate the integrity of the caps covering the Polymer and Series Ponds.

	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
Example	None	Noted	Grass no dead or discolored	Rock lined east and south None

Polymer Pond	Cap is in excellent condition w/ good sloped cover
Series Pond	Cap is in good condition w/ good slope & cover

RECOVERY TREATMENT

Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells

Well No.	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
Example RW-3	Operational	2' x 2' Good	Good	Leaking	Repaired

All recovery wells are operating

Treatment System

Unit.	Status	Notes
Example Effluent	Operational	Collected samples for City (TTO, Nickel, MIBK, pH)

Breeze	good
Defoamer	good
Moisture Traps	good
Carbon Filtration	good
Effluent	good

AZS SITE INSPECTION FORM

DATE: *11-01-05* TIME: *0830* INSPECTOR (Name/Affiliation): *CS Hill (Dobbs)*

MONITOR WELLS:

List the monitor wells inspected and mark the appropriate items.

	Well No.	Lock	Cover	Concrete Pad	Inner Casing	Notes (Ventilation Holes)
Example	MW-7	No	Good	(Yes/Yes) 2' x 2'	Good 2"	Good w Cap Lock installed

1	<i>MW-45</i>	<i>Yes</i>	<i>Good</i>	<i>Good</i>	<i>Good</i>	<i>All Good</i>
2	<i>MW-47</i>			<i>Needs Backfill Around Pad</i>		
3	<i>MW-48</i>			<i>Good</i>		
4	<i>MW-49</i>					
5	<i>MW-52</i>					
6	<i>MW-53(D)</i>					

CLAY CAPS:

Evaluate the integrity of the caps covering the Polymer and Series Ponds.

	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
Example	None	Noted	Grass no dead or discolored	Rock lined east and south None

Polymer Pond *The grass cover and earthen cover are very good.*

Series Pond *The grass cover is good the earthen cover is wet in some areas due to run-on*

RECOVERY TREATMENT

Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells

	Well No.	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
Example	RW-3	Operational	2' x 2' Good	Good	Leaking	Repaired

Treatment System

	Unit.	Status	Notes
Example	Effluent	Operational	Collected samples for City (TTO, Nickel, MIBK, pH)

Breeze

Defoamer

Moisture Traps

Carbon Filtration

Effluent

All systems okay



AZS SITE INSPECTION FORM
 Facility ID. No. GAD981237225

DATE: 06-21-06 TIME: 1000 - 1100
 INSPECTOR (Name/Affiliation): CS Hill (Dobbs)

MONITOR WELLS: List the monitor wells inspected and mark the appropriate items.

Well No.	Lock	Cover	Concrete Pad	Inner Casing	Notes
	(Ventilation/Weep Holes)				
Example MW-7	No	Good (Yes/Yes)	2' x 2' Good	2" Good w Cap	New Lock
1 MW-46		Good	Good	Good	
2 MW-47		↓	↓	↓	
3 MW-48					
4 MW-49					
5 MW-52					
6 MW-53					

CLAY CAPS: Evaluate the integrity of the caps covering the Polymer and Series Ponds.

Pond.	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
Example	None Noted	Grass no dead or discolored	Rock lined east and south	

None

Polymer Pond **Polymer CAP is in good condition no erosion etc.**

Series Pond **CAP is in good condition**

RECOVERY TREATMENT: Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells

Well No.	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
Example RW-3	Operational	2' x 2' Good	Good	Leakin Repaired Meter	
RW-3	On	Good			

Treatment System **Flow Meter operating (2,061,600)**

Example Unit Status Notes

Effluent Operational Collected samples for City (TTO, Nickel, MIBK, pH)

Breeze

Defoamer

Moisture Traps

Carbon Filtration

Effluent

All treatment system components operating and in good condition

OVA Reading: 0 ppm

OTHER ITEMS: Evaluate the condition of other pertinent site features or items.

Perimeter Fence **As usual fence and gates have holes where homeless cut through property.**

Warning Signs **Yes**

Gate & Locks **Main gate (auto gate) is locked**

AZS SITE INSPECTION FORM

Facility ID. No. GAD981237225

DATE: 07-20-04 TIME: 1015-1115
INSPECTOR (Name/Affiliation): CSHill (Dobbs)

MONITOR WELLS: List the monitor wells inspected and mark the appropriate items.

Well No.	Lock	Cover (Ventilation/Weep Holes)	Concrete Pad	Inner Casing	Notes
Example MW-7	No	Good (Yes/Yes)	2' x 2' Good	2" Good w Cap	New Lock
1 MW-7		Good	Good	Good	
2 MW-29		↓	↓	↓	
3 MW-30					
4 MW-11					
5 MW-27					
6 MW-9					

CLAY CAPS: Evaluate the integrity of the caps covering the Polymer and Series Ponds.

Pond.	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
Example	None	Noted	Grass no dead or discolored	Rock lined east and south
Polymer Pond	Polymer CAP is in good condition no erosion etc.			
Series Pond	CAP is in good condition			

RECOVERY TREATMENT: Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells					
Well No.	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
Example RW-3	Operational	2' x 2' Good	Good	Leakin	Repaired Meter
RW-28	Good	01	Good		
RW-4	↓	↓	↓		
Treatment System	Flow Meter (400/New)				
Example Unit	Status	Notes			
Effluent Operational	Collected samples for City (TTO, Nickel, MIBK, pH)				

Breeze
Defoamer
Moisture Traps
Carbon Filtration
Effluent

All components workin and in good order / copper wiring had been stolen and has been replaced
New flow meter installed
OVA Reading: 0 ppm

OTHER ITEMS: Evaluate the condition of other pertinent site features or items.

Perimeter Fence	As usual fence and gates have holes where homeless cut through property.
Warning Signs	Yes
Gate & Locks	Main gate (auto gate) is locked

AZS SITE INSPECTION FORM
Facility ID. No. GAD981237225

DATE: 08-15-04 TIME: 0900 - 1000
INSPECTOR (Name/Affiliation): CSHill (Dobbs)

MONITOR WELLS: List the monitor wells inspected and mark the appropriate items.

Well No.	Lock	Cover (Ventilation/Weep Holes)	Concrete Pad	Inner Casing	Notes
Example MW-7	No	Good (Yes/Yes)	2' x 2' Good	2" Good w Cap	New Lock
1 MW-6		<u>Good</u>	<u>Good</u>	<u>Good</u>	
2 MW-31					
3 MW-32					
4 MW-5					
5 MW-33					
6 MW-34					

CLAY CAPS: Evaluate the integrity of the caps covering the Polymer and Series Ponds.

Pond.	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
Example	None	Noted	Grass no dead or discolored	Rock lined east and south
Polymer Pond	<u>Polymer CAP is in good condition no erosion etc.</u>			
Series Pond	<u>CAP in good condition</u>			

RECOVERY TREATMENT: Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells	Well No.	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
Example RW-3	Operational	2' x 2'	Good	Good	Leakin	Repaired Meter
	<u>RW-4</u>	<u>ON</u>	<u>Good</u>	<u>Good</u>		
Treatment System	<u>Flow Meter (34,800)</u>					
Example Unit	Status	Notes				
Effluent	Operational	Collected samples for City (TTO, Nickel, MIBK, pH)				

Breeze	<u>All in good working condition</u>
Defoamer	
Moisture Traps	
Carbon Filtration	
Effluent	
OVA Reading: <u>0 ppm</u>	

OTHER ITEMS: Evaluate the condition of other pertinent site features or items.

Perimeter Fence	<u>As usual fence and gates have holes where homeless cut through property.</u>
Warning Signs	<u>Yes</u>
Gate & Locks	<u>Main gate (auto gate) is locked</u>

AZS SITE INSPECTION FORM

Facility ID. No. GAD981237225

DATE: *09-26-06* TIME: *1330-1430*
INSPECTOR (Name/Affiliation): *CSHill (Dobbs)*

MONITOR WELLS: List the monitor wells inspected and mark the appropriate items.

Well No.	Lock	Cover (Ventilation/Weep Holes)	Concrete Pad	Inner Casing	Notes
Example MW-7	No	Good (Yes/Yes)	2' x 2' Good	2" Good w Cap	New Lock
1 <i>MW-23</i>		<i>Good</i>	<i>Good</i>	<i>Good</i>	
2 <i>MW-1</i>		<i>↓</i>	<i>↓</i>	<i>↓</i>	
3 <i>MW-16</i>		<i>↓</i>	<i>↓</i>	<i>↓</i>	
4 <i>MW-18</i>		<i>↓</i>	<i>↓</i>	<i>↓</i>	
5 <i>MW-20</i>		<i>↓</i>	<i>↓</i>	<i>↓</i>	
6 <i>MW-24</i>		<i>↓</i>	<i>↓</i>	<i>↓</i>	

CLAY CAPS: Evaluate the integrity of the caps covering the Polymer and Series Ponds.

Pond.	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
Example	None Noted	Grass no dead or discolored	Rock lined east and south	
Polymer Pond	<i>Polymer CAP is in good condition, no erosion etc.</i>			
Series Pond	<i>CAP in good condition</i>			

RECOVERY TREATMENT: Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
Example RW-3	Operational	2' x 2' Good	Good	Leakin	Repaired Meter
<i>All pumps okay</i>					
<i>Flow Meter (140,000)</i>					
Treatment System					
Example Unit	Status	Notes			
Effluent	Operational	Collected samples for City (TTO, Nickel, MIBK, pH)			

Breeze	<i>All in good-working condition</i>
Defoamer	
Moisture Traps	
Carbon Filtration	
Effluent	
OVA Reading: 0 ppm	

OTHER ITEMS: Evaluate the condition of other pertinent site features or items.

Perimeter Fence	<i>As usual fence and gates have holes where homeless cut through property.</i>
Warning Signs	<i>Yes</i>
Gate & Locks	<i>Main gate (auto gate) is locked</i>

AZS SITE INSPECTION FORM

Facility ID. No. GAD981237225

DATE: 10-25-06 TIME: 10:00 - 11:00

INSPECTOR (Name/Affiliation): CSHill (Dobbs)

MONITOR WELLS: List the monitor wells inspected and mark the appropriate items.

Well No.	Lock	Cover (Ventilation/Weep Holes)	Concrete Pad	Inner Casing	Notes
Example MW-7	No	Good (Yes/Yes)	2' x 2' Good	2" Good w Cap	New Lock
1 MW-46		Good	Good	Good	
2 MW-47		↓	↓	↓	
3 MW-48					
4 MW-49					
5 MW-52					
6 MW-53					

CLAY CAPS: Evaluate the integrity of the caps covering the Polymer and Series Ponds.

Pond.	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
Example	None	None Noted	Grass no dead or discolored	Rock lined east and south
Polymer Pond	Polymer CAP is in good condition no erosion etc.			
Series Pond	CAP in good condition			

RECOVERY TREATMENT: Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells

Well No.	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
Example RW-3	Operational	2' x 2' Good	Good	Leakin Repaired Meter	

Pumps operating when power on (replaced wiring in RW-2A & RW-3)

Treatment System

Example Unit	Status	Notes
Effluent Operational		Collected samples for City (TTO, Nickel, MIBK, pH)

Breeze

Defoamer

Moisture Traps

Carbon Filtration

Effluent

All in good condition

OVA Reading: 0 ppm

OTHER ITEMS: Evaluate the condition of other pertinent site features or items.

Perimeter Fence As usual fence and gates have holes where homeless cut through property.

Warning Signs Yes

Gate & Locks Main gate (auto gate) is locked

AZS SITE INSPECTION FORM
Facility ID. No. GAD981237225

DATE: *11-28-06* TIME: *08:00 - 17:00*
INSPECTOR (Name/Affiliation): *CSHill (Dobbs)*

MONITOR WELLS: List the monitor wells inspected and mark the appropriate items.

Well No.	Lock	Cover (Ventilation/Weep Holes)	Concrete Pad	Inner Casing	Notes
----------	------	-----------------------------------	--------------	--------------	-------

Example MW-7 No Good (Yes/Yes) 2' x 2' Good 2" Good w Cap New Lock

1	<i>Conducted Semi-Annual event + measured water levels + total depth at every well on and off site,</i>				
2					
3					
4					
5					
6					

CLAY CAPS: Evaluate the integrity of the caps covering the Polymer and Series Ponds.

Pond.	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
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Example None None Noted Grass no dead or discolored Rock lined east and south

Polymer Pond **Polymer CAP is in good condition no erosion etc.**

Series Pond *CAP in good condition*

RECOVERY TREATMENT: Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells

Well No.	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
----------	-------------	--------------	-------------	------------	-------

Example RW-3 Operational 2' x 2' Good Good Leaking Repaired Meter

Treatment System

Example Unit	Status	Notes
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Effluent Operational Collected samples for City (TTO, Nickel, MIBK, pH)

Breeze

Defoamer

Moisture Traps

Carbon Filtration

Effluent

Flow Meter (206,400)

All in good working condition

OVA Reading: 0 ppm

OTHER ITEMS: Evaluate the condition of other pertinent site features or items.

Perimeter Fence **As usual fence and gates have holes where homeless cut through property.**

Warning Signs **Yes**

Gate & Locks **Main gate (auto gate) is locked**

AZS SITE INSPECTION FORM
 Facility ID. No. GAD981237225

DATE: 12-24-06 TIME: 10:00-11:00
 INSPECTOR (Name/Affiliation): CSHill (Dobbs)

MONITOR WELLS: List the monitor wells inspected and mark the appropriate items.

Well No.	Lock	Cover (Ventilation/Weep Holes)	Concrete Pad	Inner Casing	Notes
Example MW-7	No	Good (Yes/Yes)	2' x 2' Good	2" Good w Cap	New Lock
1 MW-14		Good	Good	Good	
2 MW-28		↓	↓	↓	
3 MW-8		↓	↓	↓	
4 MW-10		↓	↓	↓	
5 MW-15		↓	↓	↓	
6 MW-22		↓	↓	↓	

CLAY CAPS: Evaluate the integrity of the caps covering the Polymer and Series Ponds.

Pond.	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
Example	None Noted	Grass no dead or discolored	Rock lined east and south	
Polymer Pond	None			
Polymer Pond	Polymer CAP is in good condition no erosion etc.			

Series Pond CAP is in good condition

RECOVERY TREATMENT: Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells

Well No.	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
Example RW-3	Operational	2' x 2' Good	Good	Leakin Repaired Meter	

Treatment System

Example Unit Status

Effluent Operational

Flow Meter (321,100)
 Notes
 Collected samples for City (TTO, Nickel, MIBK, pH)

Breeze

Defoamer

Moisture Traps

Carbon Filtration

Effluent

All in good working condition

OVA Reading: 0 ppm

OTHER ITEMS: Evaluate the condition of other pertinent site features or items.

Perimeter Fence As usual fence and gates have holes where homeless cut through property.

Warning Signs Yes

Gate & Locks Main gate (auto gate) is locked

AZS SITE INSPECTION FORM
Facility ID. No. GAD981237225

DATE: *02-05-07* TIME: *13:30 - 14:30*
INSPECTOR (Name/Affiliation): *CSHill (Dobbs)*

MONITOR WELLS: List the monitor wells inspected and mark the appropriate items.

Well No.	Lock	Cover (Ventilation/Weep Holes)	Concrete Pad	Inner Casing	Notes
Example MW-7	No	Good (Yes/Yes)	2' x 2' Good	2" Good w Cap	New Lock
1 <i>MW-7</i>		<i>Good</i>	<i>Good</i>	<i>Good</i>	
2 <i>MW-29</i>		<i>↓</i>	<i>↓</i>	<i>↓</i>	
3 <i>MW-30</i>		<i>↓</i>	<i>↓</i>	<i>↓</i>	
4 <i>MW-11</i>		<i>↓</i>	<i>↓</i>	<i>↓</i>	
5 <i>MW-27</i>		<i>↓</i>	<i>↓</i>	<i>↓</i>	
6 <i>MW-9</i>		<i>↓</i>	<i>↓</i>	<i>↓</i>	

CLAY CAPS: Evaluate the integrity of the caps covering the Polymer and Series Ponds.

Pond.	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
Example	None	Noted	Grass no dead or discolored	Rock lined east and south
Polymer Pond	<i>Polymer CAP is in good condition no erosion etc.</i>			
Series Pond	<i>CAP is in good condition</i>			

RECOVERY TREATMENT: Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
Example RW-3	Operational	2' x 2' Good	Good	Leakin	Repaired Meter

Treatment System	Flow Meter (599,800 Malfunctioning)
Example Unit	Status
Effluent	Operational
Notes	
Collected samples for City (TTO, Nickel, MIBK, pH)	

Breeze	<i>All in good condition</i>
Defoamer	
Moisture Traps	
Carbon Filtration	
Effluent	OVA Reading: 0 ppm

OTHER ITEMS: Evaluate the condition of other pertinent site features or items.

Perimeter Fence	<i>As usual fence and gates have holes where homeless cut through property.</i>
Warning Signs	<i>Yes</i>
Gate & Locks	<i>Main gate (auto gate) is locked</i>

AZS SITE INSPECTION FORM
Facility ID. No. GAD981237225

DATE: 07-16-07 TIME:

INSPECTOR (Name/Affiliation): CSHill (Dobbs)

MONITOR WELLS: List the monitor wells inspected and mark the appropriate items.

Well No:	Lock	Cover	Concrete Pad	Inner Casing	Notes
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(Ventilation/Weep Holes)

Example MW-7 No Good (Yes/Yes) 2' x 2' Good 2" Good w Cap New Lock

1	MW-6	Good	Good	Good	
2	MW-32				
3	MW-33				
4	MW-31				
5	MW-34				
6	MW-5				

CLAY CAPS: Evaluate the integrity of the caps covering the Polymer and Series Ponds.

Pond.	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
-------	---------------	------------------	----------------	-------

Example None None Noted Grass no dead or discolored Rock lined east and south

Polymer Pond Polymer CAP is in good condition no erosion etc.

Series Pond CAP is in good condition

RECOVERY TREATMENT: Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells

Well No.	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
----------	-------------	--------------	-------------	------------	-------

Example RW-3 Operational 2' x 2' Good Good Leakin Repaired Meter

Treatment System

Example Unit Status

Effluent Operational

Flow Meter (1,395,100 malfunctioning)
Notes
Collected samples for City (TTO, Nickel, MIBK, pH)

Breeze

Defoamer

Moisture Traps

Carbon Filtration

Effluent

All in good working condition

OVA Reading: 0 ppm

OTHER ITEMS: Evaluate the condition of other pertinent site features or items.

Perimeter Fence As usual fence and gates have holes where homeless cut through property.

Warning Signs Yes

Gate & Locks Main gate (auto gate) is locked

AZS SITE INSPECTION FORM
Facility ID. No. GAD981237225

DATE: 05-01-06 TIME: 0900-1000
INSPECTOR (Name/Affiliation): CSHill (Dobbs)

MONITOR WELLS: List the monitor wells inspected and mark the appropriate items.

Well No.	Lock	Cover (Ventilation/Weep Holes)	Concrete Pad	Inner Casing	Notes
Example MW-7	No	Good (Yes/Yes)	2' x 2' Good	2" Good w Cap	New Lock
1 MW-8		Good	Good	Good	
2 MW-14		↓	↓	↓	
3 MW-28					
4 MW-10					
5 MW-15					
6 MW-22					

CLAY CAPS: Evaluate the integrity of the caps covering the Polymer and Series Ponds.

Pond.	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
Example	None	Noted	Grass no dead or discolored	Rock lined east and south
Polymer Pond	Polymer CAP is in good condition no erosion etc.			

Series Pond series Pond CAP is in good condition (some wet areas).

RECOVERY TREATMENT: Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
Example RW-3	Operational	2' x 2' Good	Good	Leakin	Repaired Meter
RW-2R	01	Good			
RW-4	↓	↓			
Treatment System	Flow Meter operating (1,803,500)				
Example Unit	Status	Notes			
Effluent	Operational	Collected samples for City (TTO, Nickel, MIBK, pH)			

Breeze
Defoamer
Moisture Traps
Carbon Filtration
Effluent

All components of treatment system are in good condition and operating

OVA Reading: 0 ppm

OTHER ITEMS: Evaluate the condition of other pertinent site features or items.

Perimeter Fence As usual fence and gates have holes where homeless cut through property.
Warning Signs Yes
Gate & Locks Main gate (auto gate) is locked

AZS SITE INSPECTION FORM
 Facility ID. No. GAD981237225

DATE: 04-11-07 TIME:

INSPECTOR (Name/Affiliation): CSHill (Dobbs)

MONITOR WELLS: List the monitor wells inspected and mark the appropriate items.

Well No.	Lock	Cover (Ventilation/Weep Holes)	Concrete Pad	Inner Casing	Notes
Example MW-7	No	Good (Yes/Yes)	2' x 2' Good	2" Good w Cap	New Lock
1 MW-23		Good	Good	Good	
2 MW-1		↓	↓	↓	
3 MW-16					
4 MW-18					
5 MW-20					
6 MW-24					

CLAY CAPS: Evaluate the integrity of the caps covering the Polymer and Series Ponds.

Pond.	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
Example	None	Noted	Grass no dead or discolored	Rock lined east and south

None

Polymer Pond Polymer CAP is in good condition no erosion etc.

Series Pond CAP is in good condition

RECOVERY TREATMENT: Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells

Well No.	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
Example RW-3	Operational	2' x 2' Good	Good	Leakin	Repaired Meter

Treatment System

Example Unit Status

Effluent Operational

Flow Meter not working (we will replace)
 Notes
 Collected samples for City (TTO, Nickel, MIBK, pH)

Breeze

Defoamer

Moisture Traps

Carbon Filtration

Effluent

All components in good working condition

OVA Reading: 0 ppm

OTHER ITEMS: Evaluate the condition of other pertinent site features or items.

Perimeter Fence As usual fence and gates have holes where homeless cut through property.

Warning Signs Yes

Gate & Locks Main gate (auto gate) is locked

AZS SITE INSPECTION FORM
Facility ID. No. GAD981237225

DATE: 05-17-07 TIME: 10:00 - 11:00

INSPECTOR (Name/Affiliation): CSHill (Dobbs)

MONITOR WELLS: List the monitor wells inspected and mark the appropriate items.

Well No.	Lock	Cover (Ventilation/Weep Holes)	Concrete Pad	Inner Casing	Notes
Example MW-7	No	Good (Yes/Yes)	2' x 2' Good	2" Good w Cap	New Lock
1 MW-46		GOOD	GOOD	GOOD	
2 MW-47		↓	↓	↓	
3 MW-48		↓	↓	↓	
4 MW-49		↓	↓	↓	
5 MW-52		↓	↓	↓	
6 MW-57		↓	↓	↓	

CLAY CAPS: Evaluate the integrity of the caps covering the Polymer and Series Ponds.

Pond.	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
Example	None Noted	Grass no dead or discolored	Rock lined east and south	
Polymer Pond	Polymer CAP is in good condition no erosion etc.			

Series Pond CAP is in good condition

RECOVERY TREATMENT: Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells

Well No.	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
Example RW-3	Operational	2' x 2' Good	Good	Leakin	Repaired Meter

Treatment System Flow Meter (2,234,300)
Example Unit Status Notes
Effluent Operational Collected samples for City (TTO, Nickel, MIBK, pH)

Breeze All in good working condition
Defoamer
Moisture Traps
Carbon Filtration OVA Reading: 0 ppm
Effluent

OTHER ITEMS: Evaluate the condition of other pertinent site features or items.

Perimeter Fence As usual fence and gates have holes where homeless cut through property.
Warning Signs Yes
Gate & Locks Main gate (auto gate) is locked

AZS SITE INSPECTION FORM
 Facility ID. No. GAD981237225

DATE: 06-24-07 TIME: 0930 - 1030
 INSPECTOR (Name/Affiliation): CSHill (Dobbs)

MONITOR WELLS: List the monitor wells inspected and mark the appropriate items.

Well No.	Lock	Cover (Ventilation/Weep Holes)	Concrete Pad	Inner Casing	Notes
Example MW-7	No	Good (Yes/Yes)	2' x 2' Good	2" Good w Cap	New Lock
1 MW-14		Good	Good	Good	
2 MW-8					
3 MW-28					
4 MW-10					
5 MW-15					
6 MW-22					

CLAY CAPS: Evaluate the integrity of the caps covering the Polymer and Series Ponds.

Pond.	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
Example	None Noted	Grass no dead or discolored	Rock lined east and south	

Polymer Pond None
 Polymer CAP is in good condition no erosion etc.

Series Pond CAP is in good condition

RECOVERY TREATMENT: Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells

Well No.	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
Example RW-3	Operational	2' x 2' Good	Good	Leakin	Repaired Meter

RW-2R Both in good order
 RW-3
 Treatment System Flow Meter (95, 100)

Example Unit Status Notes

Effluent Operational Collected samples for City (TTO, Nickel, MIBK, pH)

Breeze

Defoamer

Moisture Traps

Carbon Filtration

Effluent

All components in good condition

OVA Reading: 0 ppm

OTHER ITEMS: Evaluate the condition of other pertinent site features or items.

Perimeter Fence As usual fence and gates have holes where homeless cut through property.

Warning Signs Yes

Gate & Locks Main gate (auto gate) is locked

AZS SITE INSPECTION FORM
Facility ID. No. GAD981237225

DATE: 07-10-08 TIME:

INSPECTOR (Name/Affiliation): **CSHill (Dobbs)**

MONITOR WELLS: List the monitor wells inspected and mark the appropriate items.

Well No.	Lock	Cover (Ventilation/Weep Holes)	Concrete Pad	Inner Casing	Notes
Example MW-7	No	Good (Yes/Yes)	2' x 2' Good	2" Good w Cap	New Lock
1 <i>MW-30</i>		<i>Good</i>	<i>Good</i>	<i>Good</i>	
2 <i>MW-7</i>		<i>↓</i>	<i>↓</i>	<i>↓</i>	
3 <i>MW-29</i>					
4 <i>MW-71</i>					
5 <i>MW-27</i>					
8 <i>MW-9</i>					

CLAY CAPS: Evaluate the integrity of the caps covering the Polymer and Series Ponds.

Pond.	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
Example	None Noted	Grass no dead or discolored	Rock lined east and south	
None				

Polymer Pond **Polymer CAP is in good condition no erosion etc.**

Series Pond **CAP is in good condition.**

RECOVERY TREATMENT: Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells

Well No.	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
Example RW-3	Operational	2' x 2' Good	Good	Leakin	Repaired Meter

Treatment System	Flow Meter	(106,900)
Example Unit	Status	Notes
Effluent	Operational	Collected samples for City (TTO, Nickel, MIBK, pl)

Breeze
Defoamer
Moisture Traps
Carbon Filtration
Effluent

All in good working order - the poor

OVA Reading: 0 ppm

*106,900
95,100
11,800
16 days*

*ad knocke
ew days*

OTHER ITEMS: Evaluate the condition of other pertinent site features or items.

Perimeter Fence **As usual fence and gates have holes where homeless cut through property.**
Warning Signs **Yes**
Gate & Locks **Main gate (auto gate) is locked**

AZS SITE INSPECTION FORM
Facility ID. No. GAD981237225

DATE: ~~08-14-07~~ TIME: 0830-0930
INSPECTOR (Name/Affiliation): CSHill (Dobbs)

MONITOR WELLS: List the monitor wells inspected and mark the appropriate items.

Well No.	Lock	Cover (Ventilation/Weep Holes)	Concrete Pad	Inner Casing	Notes
Example MW-7	No	Good (Yes/Yes)	2' x 2' Good	2" Good w Cap	New Lock
1	MW-6	Good	Good	Good	
2	MW-32	↓	↓	↓	
3	MW-33				
4	MW-31				
5	MW-34				
5	MW-5				

CLAY CAPS: Evaluate the integrity of the caps covering the Polymer and Series Ponds.

Pond.	Cover Erosion	Cover Vegetation	Cover Drainage	Notes
Example	None Noted	Grass no dead or discolored	Rock lined east and south	
None				
Polymer Pond	Polymer CAP is in good condition no erosion etc.			
Series Pond	CAP in good condition			

RECOVERY TREATMENT: Evaluate the operational status of the recovery wells and treatment system.

Recovery Wells

Well No.	Pump Status	Concrete Pad	Control Box	Flow Meter	Notes
Example RW-3	Operational	2' x 2' Good	Good	Leakin	Repaired Meter

Treatment System	Flow Meter
Example Unit	Status
Effluent	Operational
	Collected samples for City (TTO, Nickel, MIBK, pH)

Breeze	system not operatic, all copper has been stolen from system back to GA Power lines must replace
Defoamer	
Moisture Traps	
Carbon Filtration	
Effluent	
	OVA Reading: 0 ppm

OTHER ITEMS: Evaluate the condition of other pertinent site features or items.

Perimeter Fence	As usual fence and gates have holes where homeless cut through property.
Warning Signs	Yes
Gate & Locks	Main gate (auto gate) is locked

Georgia Department of Natural Resources

2 Martin Luther King Jr. Dr., Suite 1154 East, Atlanta, Georgia 30334

Noel Holcomb, Commissioner
Environmental Protection Division
Carol A. Couch, Ph.D., Director
404/656-7802

November 16, 2006

MEMORANDUM

TO: Jim McNamara

THROUGH: Kim Hembree

FROM: Penny Gaynor *pmg*

SUBJECT: Semi-Annual Report for Post-Closure Care and Corrective Action of Hazardous Waste Surface Impoundments Oct. 2005 through April 2006, AZS Corporation, Atlanta, Georgia, dated August, 2006 - EPA ID#GAD981237225

COPY

BACKGROUND:

The AZS facility is located at 762 Marietta Boulevard, in Atlanta, Fulton County, Georgia. The AZS Corporation (AZS) and its predecessor operated a specialty organic chemical production facility from the mid 1980's to the early 1990's. Five waste disposal lagoons, referred to as the Polymer Pond and the Series Pond, were closed with wastes in place in 1986-1987. These two closed surface impoundments are located in the northern and southwestern portions of the facility, respectively.

In 1987, AZS submitted to the Georgia Environmental Protection Division (EPD) a Post Closure Care Permit Application for the two closed surface impoundments. On September 30, 1987, the EPD issued Hazardous Waste Permit HW-051(D) (for Post Closure Care and Corrective Action for Hazardous Waste Surface Impoundments) to AZS. On March 31, 1993, the permit was amended as part of the five- year review process. The current permit expired on September 30, 1997. In August 2000, AZS submitted a revised Permit Application. A revised Permit Application and new Permit have not been completed at this time.

The corrective action program, a pump and treat system, is currently focused on the remediation of the groundwater contaminants associated with the closed Series Ponds.

It is unknown whether or not any SWMUs or AOCs have been identified at the facility. An extensive file review will be completed to determine the facility's RFI history when time allows.

The facility is located in the Piedmont Physiographic Province. The Clairmont Formation of the Atlanta Group underlies the facility. The Clairmont consists of interlayered biotite-plagioclase gneiss and hornblende-plagioclase amphibolite.

The uppermost aquifer at the facility is found in the residual soil and upper weathered bedrock. The depth to groundwater is typically 10-20 feet. Groundwater flow across the site is generally from the east to the west at an estimated rate of 197-295 feet/year.

CORRECTIVE ACTION PROGRAM:

The groundwater corrective action program currently consists of three groundwater recovery wells (RW-2R, RW-3, & RW-4), underground piping, and a groundwater treatment system. A groundwater monitoring program for the regulated units is already in place to assist in demonstrating the effectiveness of the corrective action system.

The groundwater clean-up standards, as required by the facility's permit, are as follows for the regulated units:

<u>Hazardous Constituent</u>	<u>Concentration Limit (mg/L)</u>
acetone	Background
barium	1.00
benzene	Background
cadmium	0.01
carbon disulfide	Background
chloroform	Background
chromium	0.05
cresol (Series Pond Area Only)	Background
cyanide	Background
1,1-Dichloroethane	Background
1,1-Dichloroethylene	Background
1,4-Dioxane	Background
ethyl benzene	Background
formaldehyde	Background
lead	0.05
methyl ethyl ketone	Background
methyl isobutyl ketone	Background
methyl n-butyl ketone	Background
methylene chloride	Background
nickel	Background
tetrachloroethylene	Background
toluene	Background
1,1,1-trichloroethane	Background
trichloroethylene	Background
vinyl chloride	Background
xylene (total)	Background

Currently, there are 33 monitoring wells and 4 recovery wells (RW-1, RW-2R, RW-3, & RW-4) that comprise the well system at the facility. One monitoring well, MW-46 was destroyed in 2005 during the construction of a Georgia Power transmission line. This well has not been replaced. A map depicting the well and surface water sample locations is attached.

The following wells were sampled during the April 2006 sampling event: MW-1, MW-20, MW-24, MW-6, MW-11, MW-13, MW-15, MW-22, MW-23, MW-31, MW-32, MW-45, MW-47, MW-49, MW-52, and MW-53. The results for the April sampling of MW-23 could not be found in the report. MW-50 was not sampled because a fallen tree blocked access to this well.

EFFECTIVENESS:

A combined total of 468,000 gallons of groundwater were extracted from the recovery wells (RW-2R, RW-3, and RW-4) during the October 2005 through April 2006 reporting period. The groundwater is treated on-site with an air stripper and carbon unit. Treated groundwater is discharged to the City of Atlanta sewer system.

The highest detection of cis-1,2-dichloroethene and vinyl chloride in the April 2006 sampling event was in MW-49 at 110 ppb and 71 ppb, respectively.

CONCLUSIONS/RECOMMENDATIONS:

Based on the data reviewed to date, not enough information has been submitted to determine if the capture zone from the pumping wells is effective in containing the plume(s) at the facility. The pumping rates for each well were not provided. Details regarding the contaminant concentrations in each of the extraction wells was not provided. The following is a list of comments and deficiencies that were noted during the review of the report:

1. In accordance with 40 CFR 270.11(b), all reports required by permits and other information requested by the Director shall be signed by a person described in paragraph (a) of this section, or by a duly authorized representative of that person. No authorization has been provided by the AZS Corporation that specifies that Mr. Charles S. Hill is the duly authorized representative. Therefore, the 40 CFR 270.11 certification must be resubmitted in accordance with the regulations described above.
2. Section 2.0 – This section states that monitoring wells MW-1, MW-20, MW-24, MW-6, MW-11, MW-13, MW-15, MW-22, MW-23, MW-31, MW-32, MW-45, MW-47, MW-49, MW-52, and MW-53 were sampling for the April 2006 sampling event. No analytical data was found for MW-23. In accordance with Condition II.L.2.(h). of AZS's Hazardous Waste Permit, "Samples shall be obtained at least semi-annually from the wells identified in Condition II.L.1.(a) and (c) and from Bellwood Branch, from at least

sampling points, 1, 2, 3, and 4 as described in Section VII of the permit application, and analyzed for all parameters specified in Table II-1." The following monitoring wells are identified in Condition II.L.1. (a) and (c), and were not included in the April semi-annual sampling event: MW-2, MW-3, MW-5, MW-9, MW-16, MW-25, MW-26, MW-33, MW-34, MW-35, MW-36, MW-37, MW-38, MW-39, MW-40, MW-41, MW-42, MW-43, MW-46, MW-48, and all the sampling points on Bellwood Branch. In addition, the samples that were collected were not analyzed for all the constituents listed on Table II-1

3. Section 2.1 - This section states that total depth measurements were collected and recorded at the same time the groundwater depths were measured. No documentation of the total depth measurements collected during the October 2005 through April 2006 reporting period could be found in the report.
4. Section 2.1- This section states that AZS is using an assumed saturated porosity of 21 percent to calculate groundwater flow velocity. The groundwater flow velocity should be calculated using the effective porosity. AZS should provide the reference for the effective porosity used for the facility.
5. Section 2.1 – Wells MW-23 and MW-53 should not be used to calculate groundwater horizontal gradients and flow rates because the screened intervals of these wells are installed in two different hydrogeologic units, namely weathered bedrock and competent bedrock. Groundwater horizontal gradients and flow rates must be calculated using data collected from wells installed in the same hydrogeologic unit and located along the same flow path.
6. Section 2.2.1. – This section proposes to cease analyzing for formaldehyde at the AZS site. Background concentrations of formaldehyde were 59 ppb in MW-1 but in downgradient wells MW-20 and MW-24 the concentrations were 120 and 180 ppb, respectively. This data does not support the discontinuation of groundwater monitoring at the AZS site. In addition, per 40 CFR 270.42 Appendix I (c)(5)(a), the removal of constituents from the groundwater monitoring requirements of the permit requires a Class 3 permit modification.
7. Section 2.2.2. – This section states that TCE and PCE were detected in only a few wells in the Series Pond Area. It also states that, "these constituents do not, in Dobbs opinion, indicate the presence of a "plume" emanating from the Series Pond but appear to be random detection's as groundwater on-site nears asymptotic levels". The detection of PCE at 140 ppb in MW-23 is not random or near asymptotic levels. This does indicate PCE may be entering the site from an offsite source, as MW-23 is a background well located upgradient of facility process and disposal areas. The low levels of PCE and

TCE found in MW-31 may be degradation products of the PCE coming from an offsite source.

8. Section 3.0 – Not enough information is provided regarding the onsite groundwater extraction and treatment system. Details about the groundwater extraction wells (ie., operating hours, pumping rates, etc...) must be provided. In addition, more information regarding the treatment system must be provided (ie., details of each unit in the treatment system, and all analysis performed on the groundwater before entering the treatment system, after exiting the air stripper, and after exiting the carbon unit). If available, all analytical data from each individual extraction well must also be provided.
9. Table I - AZS must include the total depth measurement taken for each sampling event.
10. Table I – This table states that MW-46 was destroyed by Georgia Power transmission line construction sometime after November 2004. This well is a permitted well (Permit Condition II.L.1.(c).) and must be replaced. AZS must submit a workplan for the installation of a replacement well for MW-46. The workplan must include a schedule of implementation.
11. Table I – No total depth is noted for RW-1.
12. Table II – This table states that a fallen tree had blocked MW-50, therefore, it was not sampled. AZS must either document the tree has been removed or provide a schedule for the tree removal.
13. Table III – This table identifies MW-31 with an asterisk (*). However in the footnotes at the bottom of the page next to the asterisk (*) it states that MW-28 was analyzed for Appendix IX constituents. AZS must clarify which well, either MW-31 or MW-28, was analyzed for Appendix IX constituents.
14. Figure II through Figure V – These figures identify the wells with labels indicating the well number, then in parentheses a letter (ie., MW-23(B) or MW-5(S)). There is no description in the legend identifying what these letters symbolize.

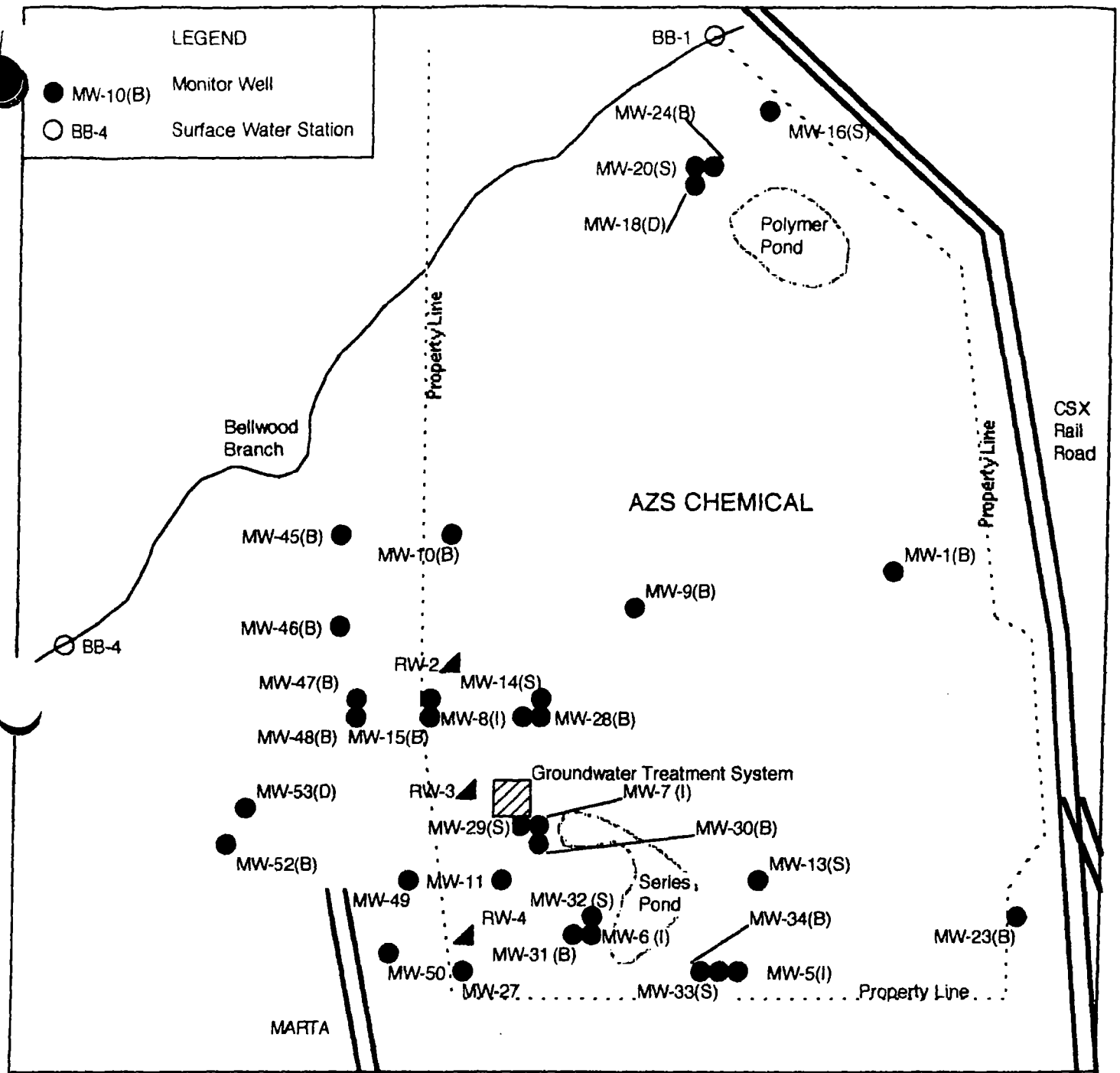
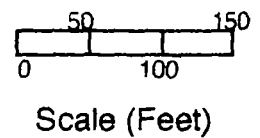


FIGURE II
MONITOR WELL LOCATION MAP
AZS Chemical Site
Atlanta, Fulton County, Georgia



RFA REPORT

AZS CORPORATION
ATLANTA, GEORGIA

GAD057288144

C-155-A

I. INTRODUCTION

OBJECTIVE/SCOPE

The objective of this RCRA Facility Assessment (RFA) is to:

1. Identify all Solid Waste Management Units (SWMUs) which have operated at AZS Corporation, Atlanta, Georgia.
2. Collect SWMU-related data from file reviews and a site visit and evaluate these data to assess the potential for release of hazardous constituents from each SWMU; and,
3. For each unit, determine what course of action, if any, should be followed to safeguard human health and the environment from a SWMU release. When further remedial investigation or corrective action not already underway is deemed appropriate, provide a site-specific conceptual plan (e.g., a sampling plan) that may be used to initiate necessary clean up and/or restoration.

ASSESSMENT BASIS

The findings, conclusions, and suggested actions contained in this report are based on:

1. A desktop study of the existing files and Part B permit application.
2. A site inspection performed on March 20, 1987.

SITE CONDITIONS

1. Receptor Information

AZS Corporation is located in Fulton County, Georgia within the city limits of Atlanta, approximately 5 miles northwest of the city center. The address is:

AZS Corporation
762 Marietta Boulevard
Atlanta, Georgia 30318

AZS is a specialty organic chemical manufacturing facility which has been operational at its present site since the early 1900's. Previous to AZS ownership, the site was utilized as a rock quarry. AZS Corporation is a wholly owned subsidiary of Toyo Soda Manufacturing Company, Ltd.

The active manufacturing site is composed of about 5 acres. The polymer plant, polymer pond, monomer tank farm, wastewater treatment plant, research and development laboratory and an office occupy the north one-half of the site. The other half of the site is occupied by the central warehouse, main office, finishing plant, finish plant tank farm, alkyd resin plant, alkyd resin tank farm, shop and 4 wastewater treatment ponds (series ponds). A site plan is presented in Figure 1.

The surrounding land uses include residential, light and heavy industrial. Several thousand people live and work in the areas surrounding the AZS facility.

2. Surface Waters

Bellwood Creek forms the north and a portion of the west boundaries of the site. Bellwood Creek flows southwestward and discharges to Proctor Creek, approximately 1,500 feet west of the facility. Bellwood and Proctor Creeks have a velocity less than 5 feet/sec. Proctor Creek flows to the northwest and discharges into the Chattahoochee River at mile 197.50, 3 miles downstream of the Atlanta City water intake. The river is used for recreation and domestic and industrial water supplies.

On the northwestern boundary of the facility, land immediately adjacent to Bellwood Creek is located in the 100-year floodplain. The 100-year floodplain reaches 860 feet; however, less than 1 percent of the site is at 860 feet or a lower elevation.

Topographically, the AZS facility is separated into 2 separate sub-basin areas north and south of an east-west line through the facility. All surface runoff discharges to Bellwood Creek. Sixty percent of all surface runoff is collected by 2 storm sewer systems which discharge by outfalls 001 and 002 (north and south respectively) to Bellwood. Two sanitary systems also service the site.

At the present, AZS is undergoing a determination process to assess whether Bellwood Creek is also the final discharge point for all groundwater flowing through the upper aquifer under the AZS property. The final determination is due July 1, 1987.

Surface elevation in the south drainage sub-basin drops from 915 feet to 870 feet over a distance of approximately 1000 feet. In the north drainage sub-basin, surface elevation drops from 910 feet to 860 feet over approximately 800 feet.

3. Geology and Hydrology

The AZS facility is located in the Piedmont Geologic Province just to the east of the Brevard Fault Zone. A generalized 1976 State Geologic map shows the general area being mapped as biotitic gneiss and granite gneiss.

More recent and detailed mapping shows the AZS area as being the Clairmont Formation of the Atlanta Group. The Clairmont is described as an interlayered medium grained biotite-plagioclase gneiss and fine-to-medium grained hornblende-plagioclase amphibolite.

Drilling logs describe the bedrock underlying AZS as primarily biotite-plagioclase-rich gneiss. Drilling logs from MW-18 indicate a mineralized joint, at a depth of 48 feet, $15-20^\circ$ from vertical that is filled with gypsum. A second hydrologically active bedrock zone is that associated with a horizontal stress relief fracture at a depth of 440 feet. The horizontal fracture is likely connected to the surficial hydrologic zone by an

indeterminant pattern of vertical fractures which serves as a water recharge mechanism. The regional analysis performed by the Georgia Geologic Survey suggests that the dimensions of such systems extend over large areas. AZS utilizes this fracture, through 2 deep wells, to provide process water.

The bedrock surface beneath the AZS site closely follows the surface topography. The most prominent feature is the bedrock valley coincident with the series ponds. The soil overburden thickness map, Figure 2, shows that much of the central portion of the facility has bedrock at depths less than 15 feet. Some bedrock outcrops in the upgradient area east of MW-1. The area of increased overburden thickness in the vicinity of the Polymer Pond may reflect the presence of fill material.

Figures 3-6 present bedrock cross-sections. Figure 2 provides the location of each cross-section. These diagrams illustrate the steepness of the bedrock topography and water table through the series pond drainage way. At several points, the upper water table surface is within the weathered bedrock zone. The permeability testing has indicated that the soil overburden and weathered bedrock act as a single aquifer unit through the hydrologically active zone which extends to a depth of about 20 feet into the bedrock.

Weathered bedrock is described across the site as schist and granite with some quartz. The measured depth of weathered bedrock ranged from 0 to 16 feet. The maximum soil depth of 41.7 feet is found in the series pond drainage way. The sharp contrast to the 9 foot thickness at nearby MW-10 may reflect an artificially steep gradient due to grading associated with the construction of the Maintenance Building. Soils were characterized as silt and fine sand.

4. Groundwater

Twenty-three observation wells have been located on-site with 20 additional wells, 12 on-site and 8 off-site, presently under construction. All wells are designed to detect and monitor groundwater contamination resulting from the operation of 5 surface impoundments, so as to satisfy RCRA requirements. All well locations are presented in Figure 7.

A mobile B-53 drill rig was used to bore and install all wells. A wide variety of tools were used to complete the boreholes including 6 inch and 16 inch soil augers, 2 inch split spoon samples, 2.5 inch wire line rock coring barrels, and 3-5/8 inch and 6 inch down hole air hammers. The drill rig, drilling equipment, and well construction materials were steam cleaned before starting and between each borehole. All steam cleaning was conducted on a concrete pad adjacent to the polymer plant. This area drains to the new AZS Wastewater Treatment Facility. Well construction data is presented in Table 1.

To date, results from the groundwater assessment indicate the northern half of the site (the Polymer Pond area) drains as a general broad flow to the northwest with at least some discharge into Bellwood Creek. Groundwater flow is through the residual soil and weathered bedrock.

The southern half of the site (the series pond area) drains in a more westerly direction to Bellwood Creek as it opens up into the more level flood plain with Proctor Creek. Within AZS property there is a flow convergence to a flow axis which follows the course of the small stream which existed on the

site prior to the original construction of the AZS facility. The excavations required for the series pond closure did reveal presence of the original stream bed at a depth of 10-12 feet. The flow convergence would limit the possible dispersion of regulated materials which might have entered the groundwater system. The site closure activities also indicated that some bedrock had been excavated before or during the series pond construction. The Neutralization Pond and Settling Pond (2 of the 4 series ponds) both were excavated to a rock bottom.

The AZS Series Pond flow axis receives groundwater originating from a sizable drainage area east or upgradient of the facility. The surface drainage divide is in the middle of an industrial area approximately 2500 feet east of AZS.

Downgradient of AZS the Series Pond flow axis extends through an automobile junk yard and a machine shop which has metal cleaning and painting operations. Although specific monitoring in the far downgradient area is not available, basic hydrologic principles dictate an ultimate discharge zone into Bellwood Branch. AZS is presently gathering data to determine the ultimate discharge zone.

Two deep wells are located on the AZS plant property. There are no drilling logs or static water level information available for these wells. The wells are pumped for noncontact cooling water purposes.

The well locations are depicted on Figures III-3 and III-4. The Building A well is located on the east side of AZS property near the main gate in a topographically upgradient position to most AZS activities. The well was drilled in 1960 and is 444 feet deep. The Polymer Well has been assigned to Georgia Geologic Survey Identification Number 10EE5. The Polymer Well is located in the middle of the AZS facility. This well was drilled in 1967 and is 531 feet deep. The Polymer Well has been assigned the Georgia Geologic Survey Identification Number 10EE6. Both wells have 9 inch casing to bedrock. The wells yield approximately 300 gpm. The pumping cones of depression are not documented.

Geophysical logging of the 2 deep wells, as well as slug and drawdown recovery tests of the observation wells were used to generate groundwater movement data. A mean site permeability of 13.8 gpd/sq.ft. (1.8 ft/day) has been calculated. Flow rates of 1.10 ft/day (403 ft/year) and 1.59 ft/day (580 ft/year) were estimated for the series and polymer pond areas, respectively. The saturated zone in the overburden and bedrock was determined to average 35 feet in thickness for the series pond area and 55 feet for the polymer pond area. Consequently, the AZS facility has been characterized as having relatively rapid rates of groundwater movement driven by a large hydraulic gradient.

5. Nature of operations and wastes generated

AZS corporation is a production facility for organic chemicals including adhesives, polymers, textile chemicals, and speciality amines. Throughout the lifetime, the plant has produced a large, undocumented, and thus indefinite array of products and wastes. Products and wastes can change monthly.

The primary organic processes are as follows:

1. Emulsion Polymer Production

This process is a batch free radical polymerization taking place in a continuous water phase using water soluble initiators (catalysts). Surfactants are used to emulsify the monomers and to yield a stable product. Reactions are exothermic. Heat of polymerization is carried away by the water phase to the jacket or coils. Some heat may be removed by the reflex condenser by condensation of hot monomer vapors, thereby removing heat equal to the latent heat. Due to exothermic nature of these reactions, monomers are fed slowly from a monomer feed vessel to the reactor so as to maintain isothermal conditions. Waste heat is shed to the cooling towers via noncontact cooling water.

2. Alkyd Resin Production

This is a batch polymerization process of the condensation type. Air is evacuated from the reactor and the contents are nitrogen blanketed so as to yield product of light color. Water is the by-product of this reaction.

3. Hydrogenation Process

A nitrile and a catalyst are charged to the hydrogenator. Hydrogen, at pressures of up to 480 psi, is added. After heating up to reaction temperature with steam in the vessel jacket, the reaction proceeds exothermically. Heat is removed by noncontact cooling water.

4. Textile Finish, Size Chemical Production

Simple blending, mixing, dissolving with or without heat is required.

Wastes presently generated include solid and hazardous wastes, wastewaters, and air emissions. The sources, as well as management of the wastes, are described as follows:

a. Solid and Hazardous Wastes

The solid and hazardous waste generated by AZS include chemical wastes from vessel clean out, quality control and research and development laboratories, spent catalysts, filter cake, used lubricative oil from vehicle maintenance, cooling tower discharge, charcoal from packed tower scrubber/carbon absorbers, and recovered, spent, off-spec and other used materials from production processes. Table 2 lists the recently generated hazardous wastes and the associated EPA identification number.

Most of the production processes produce waste streams which are composed of wastes from vessel clean out. AZS

Once declared a waste, secondary materials not suitable for burning as fuel are transported to an off-site sanitary or hazardous waste landfill for disposal, within 90 days. Wastes suitable for burning as fuel are accumulated in storage tank 17 for disposal as hazardous waste fuel. The contents of tank 17 are sold to a burner, every 30 days, and removed.

Approximately 113 tanks are present at the facility, but only tanks 17, 18 and 29 are described as receiving possible wastes. Tanks 18 and 29 received recovered MIBK and Epichlorohydrin, respectively. Table 3 lists all tanks and their contents.

All other solid wastes, for example filter cakes and spent catalyst, are stored in 55 gallon drums and transported off-site for disposal. Other than the 5 surface impoundments, there has been no evidence of land disposal (other than spills) of wastes on-site.

b. Wastewater Treatment and Disposal

The facility's process wastewater is handled entirely by their above-ground pretreatment plant prior to discharge into the City of Atlanta sanitary sewer. The pretreatment plant includes a 450,000 gallon holding tank, neutralization tank, and a caustic and acid tank. Two lift stations (north and south) pump all process wastewater to the pretreatment station.

The storm sewer system has been re-routed and upgraded to prevent wastewater from entering this system. The storm sewers have been sealed at the tank car loading/unloading area and at the truck wash. Both areas now drain into the sanitary sewer. Diversion boxes (sumps, conductivity meters, sluice gates, and pumps) on the two (north and south) storm outfalls are fully automated to divert a spill to the pretreatment station or to empty storage tanks for recovery.

c. Air Emission Control

The facility is in a non-attainment area so no NESHAP, NSPS, or NSR rules apply. However, Georgia's Air Protection Branch has permitted AZS to construct and operate 5 emission scrubbers and 1 thermal incinerator (permit numbers 2819-060-6536, 2869-060-9336, and 2869-060-9541).

Polymer plant operation involves filling of weigh tanks and reactors with volatile organic monomers, which displaces vapors of these materials as emissions. Some vapor also is emitted through process condensers in the

reaction-- process. Currently, these monomer vapor emissions are vented through scrubber S-1, which recirculates a solution of various amines and caustic through a packed tower.

AZS is installing and plans to operate a thermal incinerator in the polymer plant area. The incinerator is the state-of-the-art control that is more reliable than scrubbing and has a higher theoretical destruction efficiency. The approved incinerator is a McGill RGR-7 thermal incinerator, with a 2-foot diameter, 50-foot tall stack. The unit will be fired on natural gas. The acrylonitrile storage tank will also be vented to the incinerator.

Vapor emissions from the finish plant and truck wash station are controlled by a packed tower scrubber, followed by a carbon absorption drum. Here, the main purpose of control is to reduce epichlorohydrin emissions from Reactor 15, as well as filling/breathing losses from epichlorohydrin storage and Reactor 5 (produces a glycidyl ether product). Reactors 5 and 15 are the only reactor at elevated temperatures on-site.

Tanker trucks, generally 6,000 gallon in size, are washed with 500 gallons of either water or caustic which are held in separate reservoirs. Initially, displaced vapors from the truck interiors are vented to either the water/caustic tanks by vapor return lines, but when wash liquid is returned to the tanks vapor is displaced to the scrubber via a separator.

The Georgia Air Pollution Compliance Program estimates total hydrocarbon emissions are on the order of 5 ton/year. Most of these emissions are toluene vapors emitted when large molecular weight polymers are cut with toluene to reduce viscosity.

6. Release Pathways

a. Soil and Groundwater.

AZS has verified and confirmed the presence of contaminated groundwater. A completed corrective action permit application is expected by July 1, 1987 as required by an amended Consent Order. Groundwater contamination immediately upgradient of the series ponds (MW-5 and MW-13) will be included in the RCRA permit with respect to corrective action.

Considering the limited drainage axes which exist through AZS and their relative position to the area of expected corrective action nearly all of the groundwater moving through the upper aquifer under AZS should be effectively monitored and remediated.

b. Surface Waters

There is a potential for release to affect Bellwood Creek and ultimately Proctor Creek and the Chattahoochee River. Known past releases from spills have impacted both creeks. Past analyses of Bellwood waters both upgradient and downgradient of AZS property have indicated some changes in groundwater quality have occurred.

The corrective action program should eliminate contamination discharge to Bellwood other than at the surface runoff. Construction and operation of the new storm sewer system and diversion boxes greatly diminished the possibility of spills reaching surface waters. AZS has also implemented an elaborate spill control contingency plan.

c. Air Emissions.

AZS has greatly improved its control of emissions since 1985. State-of-the art equipment is under construction, and more is expected. Only the control of toluene emissions remain to be negotiated. There appears no identifiable SWMU that would release hazardous constituents to the air.

d. Subsurface Gas

There appears no potential for subsurface gas generation.

7. Spills

A review of Georgia's EPD files indicate a minimum of 12 spill-type releases occurred at the AZS facility from April 1984 to November 1985. Between April 2 and June 8, 1984, GaEPD investigated 3 releases from the alkyd pond. Solids floating on the pond were washed into an overflow pipe opening which overloaded the hydraulic capacity of the sanitary sewer. These releases were the result of 2 separate incidents. First, the alkyd pond exceeded normal operation level due to heavy rains, resulting in a surface withdrawal of wastewater. Second, the hydraulic capacity of the sanitary sewer on adjoining property was reduced due to tallow-like deposits and resulted in the sewer overflows. AZS personnel removed all observable contamination and sewer lines were cleaned out to remove obstructions.

On December 9, 1984, a rain storm flushed a polyester resin material from the surface of the AZS parking lot to the storm sewer and possibly to Bellwood Creek. The material identified as non-hazardous by AZS, was a residual from the clean out of a tank truck gear pump. To prevent future occurrences of this nature in the parking lot areas, the following administrative procedure was initiated:

- (1) All storm sewer drains were identified with green paint to denote the difference between storm and process sewers.
- (2) All AZS employees were re-instructed not to clean any process equipment in the parking lot areas or in the vicinity of storm sewers.

(3) AZS reviewed with all personnel their (SPCC) spill control manual.

On January 18, 1985, a release of textile chemicals and wax occurred after an 8-inch sanitary line was blocked. Overflow from the sanitary line spilled into the storm sewer system and possibly Bellwood Creek. The sewer system was pumped out, sending water to the settling pond. During operations, the storm sewer sluice gate was closed to divert flow containing chemicals to the sanitary system. AZS reported their personnel would closely watch the line in order to assure no accumulation within the line.

On January 21, 1985, a spill of fuel oil occurred during a transfer operation from an above ground storage tank to an underground tank. The spill reached both Bellwood and Proctor Creeks. A total of 55 gallons of fuel oil was eventually recovered. To prevent future releases to Bellwood Creek, AZS proposed to construct a pump and holding tank system at each of the 2 outfalls.

On March 1, 1985, a spill of ammonia scrubber water occurred at approximately 0400 hours. The spill was a result of a plugged sanitary line that feeds the main discharge line from the polymer pond area. The ammonia water overflowed to a storm drain where it was contained at the north outfall. A second spill of the same nature occurred at 0615 hours and was contained at the outfall and pumped to a sanitary line before the outfall sluice gates were reopened. On March 5, 1985, a third spill of the same nature occurred at 1100 hours. This spill reached Bellwood Creek where the material was collected and pumped back to a sanitary line. As a result AZS and the City of Atlanta began negotiations to enlarge the sanitary line.

On May 16, 1985, wastewater from the settling pond was released to Bellwood Creek. A sluice gate between the settling and alkyd ponds dropped down into a closed position, late on May 15. The settling pond subsequently overflowed the following morning. Once the release was identified, the sluice gates at the south outfall were closed and the sluice pump started. Some of the wastewater had already entered the creek. A sorbent boom and universal spill pillows were used to dam up the material at the junction of Bellwood and Proctor Creeks. A portable gas-driven pump was used to pump material from the creek to AZS tank trucks. Approximately 60,000 gallons of water was removed. To assure no further accidents, a locking mechanism was installed on the sluice gate between the ponds. Environmental inspections were increased to every 2 hours (12 times per day).

On October 2, 1985, an organic nitrate spill was identified as a result of a 2 hour environmental inspection. Booms were placed across Bellwood Creek, and as a result the spill was contained to AZS property. The spill was a result of the mechanical failure of a hydrogenator cooling loop. The loop was replaced to prevent further accidents.

On November 12, 1985, white wastewater was observed coming out of the ground along the back of a ditch leading to Bellwood Creek. After a week of plugging sewer lines and performing dye tests, the source of the leak

was located on November 20. A section of terra cotta pipe between the polymer plant and a new sump was leaking in several places. AZS officials suspected that blasting conducted to construct the new sump had damaged the line. Approximately 100 feet of line was replaced using vitrified clay pipe on November 25. The ground was flushed with water for a few days to remove all the polymer wastewater, later identified as containing MIBK and 2-ethyl-1-hexanol at 270 and 365 ppm, respectively. From November 12 till the flushing was completed, the ditch was pumped to protect Bellwood Creek.

There has been no assessment of the impact these releases have had other than through AZS's RCRA groundwater monitoring programs. There have been no reported releases over the last 16 months.

SUMMARY AND CONCLUSIONS

The only SWMU's not already addressed by a RCRA program are the underground wastes pipes that carry wastewaters to the pretreatment facility and the drum storage area east of the polymer plant. There is no indication of a release from the surface. However, with respect to the underground pipes, there is low potential of leakage, as damages from past construction activities have proven. The corrective action plan for the RCRA regulated units will include the monitoring of water quality within Bellwood Creek. Consequently, releases from underground process pipes may be detected upon infiltration. Table 3 presents an inventory of all potential SWMUs and Figure 8 presents their location.

Other questions which need to be resolved include:

- (1) Information on the specific wastes produced by AZS.
- (2) Proof that AZS is recycling sufficient amounts of their nonexempt secondary materials and these wastes are managed correctly to prevent releases.
- (3) Information on the design of tanks 18 and 29 and their use in connection with the recovery and storage of possible hazardous waste.

Sometime in the summer of 1987, a risk assessment report is to be completed by Region IV, EPA that evaluates potential catastrophic events deemed possible at AZS.

Table 1. Well construction data, AZS Corporation, Atlanta Georgia.

<u>LOCATION</u>	<u>SURFACE ELEV.</u>	<u>TOP OF CASE</u>	<u>TOP OF SCREEN</u>	<u>BOTTOM OF SCREEN</u>	<u>TOP OF ROCK</u>	<u>TOP OF SANDPACK</u>	<u>RISER SCREEN</u>
MW-1	908.84	910.21	899.21	889.21	898.34	889.84	PVC
MW-2	873.07	874.82	860.07	850.07	854.57	861.07	PVC
MW-3	870.76	872.66	857.76	847.76	852.26	859.76	PVC
MW-4	866.93	869.22	851.93	841.93	853.43	852.93	PVC
MW-5	913.70	916.05	887.70	887.70	884.70	889.70	PVC
MW-6	886.29	887.90	872.29	862.29	867.79	874.29	PVC
MW-7	872.22	874.68	855.22	845.22	853.72	857.22	PVC
MW-8	872.28	874.99	855.28	845.28	848.78	857.28	PVC
MW-9	889.62	891.43	873.62	863.62	879.22	882.02	PVC Teflon
MW-10	872.16	873.96	850.06	846.06	863.16	864.16	PVC Teflon
MW-11	873.96	875.87	865.96	855.96	855.26	867.96	PVC Teflon
MW-12	886.02	887.34	882.52	872.52	872.52	883.02	PVC Teflon
MW-13	899.08	900.81	881.08	871.08	883.28	885.58	PVC Teflon
MW-14	873.43	875.99	861.23	851.23	No Rock	863.33	PVC Teflon
MW-15	871.39	Surface Mount	826.39	816.39	830.69	834.39	Stainless Steel
MW-16	870.91	873.20	869.24	849.24	No Rock	869.91	PVC Teflon
MW-17	914.09	Surface Mount	--	--	896.59	--	--
MW-18	874.47	876.68	805	795	846.29	807	PVC Stainless

Table 1. cont.

<u>LOCATION</u>	<u>SURFACE ELEV.</u>	<u>TOP OF CASE</u>	<u>TOP OF SCREEN</u>	<u>BOTTOM OF SCREEN</u>	<u>TOP OF ROCK</u>	<u>TOP OF SANDPACK</u>	<u>RISER SCREEN</u>
MW-19	871.62	Surface Mount	--	671.62	829.92	--	--
MW-20	872.56	875.00	862.06	852.06	No Rock	864.56	PVC
MW-21	914.54	916.16	903.04	893.04	895.74	904.54	Stainless Steel
MW-22	871.14	Surface Mount	855.64	845.64	No Rock	858.14	PVC Teflon
MW-23	905.48	906.97	895.98	885.98	896.28	897.48	Stainless Steel
Bldg. A	914.28			470	889		
Polymer	908.84			378	896		

Table 2 Hazardous Waastes Generated

<u>WASTE</u>	<u>EPA NUMBER</u>
Toluene	U220, F005
Amine Forecut	DC01
MIBK	U161, F003
Epichlorohydrin	DC01
Nonchlorinated solvents	F003
Chlorinated solvents	F002
Used oil	DC01
(mixed with F003, F002)	

Hazardous Constituents in Impoundments

Methylene Chloride	U080
Carbon disulfide	PC22
Acetone	U002
1,1 Dichloroethylene	U078
Chloroform	U044
1,1,1, Trichloroethane	U226
1,3 Dichloropropene	U084
Benzene	U019
Chlorobenzene	U037
Carbon Tetrachloride	U211
Tetrachloroethylene	U210
Toluene	U220
Methyl Isobutyl Ketone	U161
1,2 Dichloroethylene	U079
Napthalene	U165
Formaldehyde	U122
Mercury	U151

2 3. Raw material, product and waste tanks.

<u>Tank Number</u>	<u>Product Number</u>	<u>Product</u>	<u>Gallons</u>	<u>Material Construction</u>	<u>Diked</u>	<u>Level Indicator</u>
<u>POLYMER WAREHOUSE</u>						
82	F-862	Paint Polymer	12,000	Stainless Steel		
83	G-158	Paint Polymer	12,000	Stainless Steel		
77	G-078	Emulsion Polymer	10,000	Stainless Steel		
78	G-140	Emulsion Polymer	10,000	Stainless Steel		
90	F-965	Emulsion Polymer	12,000	Stainless Steel		
79	F-954	Emulsion Polymer	5,000	Stainless Steel		
80	F-894	Emulsion Polymer	3,000	Stainless Steel		
<u>MONOMER TANK FARM</u>						
43		Methyl Acrylate	10,000	Stainless Steel	✓	
44		Methyl Methacrylate	15,000	Stainless Steel	✓	
97		Acrylonitrile	12,000	Stainless Steel	✓	
91		Vinyl Acetate	19,000	Stainless Steel	✓	
86		Butyl Acrylate	5,000	Stainless Steel	✓	
85		Butyl Acrylate	5,000	Stainless Steel	✓	
45		Vinyl Acetate	15,000	Stainless Steel	✓	
46		Ethyl Acrylate	15,000	Stainless Steel	✓	
Primary Total Diked Diversion Volume			204,000			
Secondary Containment Volume			200,000	Gunnite		
<u>NORTH OF THE POLYMER PLANT</u>						
95	G-086	Emulsion Polymer	20,000	Stainless Steel		
96	G-094	Emulsion Polymer	20,000	Stainless Steel		
92	G-109	Emulsion Polymer	20,000-25,000			
81	F-954	(Swing Tank)	5,000			

Table 3. cont.

<u>Tank Number</u>	<u>Product Number</u>	<u>Product</u>	<u>Gallons</u>	<u>Material Construction</u>	<u>Diked</u>	<u>Level Indicator</u>
<u>NORTH OF THE POLYMER PLANT (Continued)</u>						
100	G-137	Diotyl Maleate	20,000	Stainless Steel		
99		Finishing Plant Product	20,000			
98		Decyl Alcohol	8,000	Stainless Steel		
109	S-729	2 Ethyl Hexyl Acrylate	10,000	Stainless Steel		
108		Polyester	10,000	Stainless Steel		
<u>NORTH OF POLYMER PLANT</u>						
130	F-923		10,000	Stainless Steel		
131			10,000	Stainless Steel		
132		Amine and Amine Forecut	10,000			
74	Titrox x 405	Surfactant	3,000			
<u>EAST OF POLYMER PLANT</u>						
76		25 Percent Caustic	10,000	Steel		
		Well Water	12,000	Steel		
#2 Fuel Oil		Fuel Oil				
Ammonia Tank		Anhydrous Ammonia	12,000			
<u>NORTH SIDE OF RESIN PLANT</u>						
105		Phthalic Anhydride	25,000			
103		Diethylene Glycol	25,000			
106		Soya Oil	25,000			
104		Propylene Glycol	25,000			
101		Glycerine	9,900			
102		Slyfat 95	25,000			

<u>Tank Number</u>	<u>Product Number</u>	<u>Product</u>	<u>Gallons</u>	<u>Material Construction</u>	<u>Diked</u>	<u>Level Indicator</u>
<u>WEST SIDE DRUM STORAGE WAREHOUSE</u>						
7		Methanol				LI
88		Empty				
89		Empty				
107		Chlorosulfonic Acid				
30		Sulfuric Acid (98 Percent)				DR
47	RM 629	C ₁₂ -C ₁₄ Alcohol			✓	LG
<u>FINISH PLANT TANK PAD</u>						
50	F-807	A-64 Polyethylene Emulsion	3,000	Steel	✓	SG
49	F-851	B-99ST Wax Emulsion	3,000	Glass Lined	✓	SG
53		Empty	3,000	Elasti Glass	✓	SG
51		Side Stream Butanol Epichloro	3,000	Elasti Glass	✓	SG
32		2 Ethyl Hexanol	10,000	Stainless Steel	✓	LG
48	F-998		3,000	Elasti Glass	✓	PSG
31	G-137		10,000	Stainless Steel	✓	LG
36		Swing Tank	10,000	Stainless Steel	✓	LG
68		Empty	5,000	Steel	✓	SG
67		2 Ethyl Hexanol	5,000	Steel	✓	SG
	Secondary Containment Dike		28,000	Concrete Block		
<u>DRUM WAREHOUSE</u>						
60		Empty	2,000	Steel		
61		Reserve Tank	2,000	Steel		
62		Reserve Tank	2,000	Steel		
63		Reserve Tank	2,000	Steel		
64		Reserve Tank	2,000	Steel		
65		Reserve Tank	2,000	Steel		

Table 3. cont.

<u>Tank Number</u>	<u>Product Number</u>	<u>Product</u>	<u>Gallons</u>	<u>Material Construction</u>	<u>Diked</u>	<u>Level Indicator</u>
<u>DRUM WAREHOUSE (Continued)</u>						
40		Diethylene Glycol	17,000	Aluminum		
41		Diethylene Glycol	17,000	Aluminum		
42		Diethylene Glycol	17,000	Aluminum		
<u>FINISH PLANT (FIRST FLOOR)</u>						
1	1214-40	Alcohol	3,000	Stainless Steel		SG
2	G-025 K-42	Liquid Weighter	3,000	Glass Lined		
3	F-939	Detergent Type	3,000	Glass Lined		SG
4	F-807 A-64	Polyethylene Emulsion	3,000	Pfauder Glass		SG
5	F-962	Defoamer	3,000	Pfauder Glass		SG
33	F-784	Liquid Weighter	5,000	Glass Lined		SG
34	F-705	Softener	5,000	Glass Lined		SG
35	G-044	Knit Finish Sodium Stearate	10,000	Glass Lined		
84	S-768 G-72	Hydrolized PVA	10,500	Stainless Steel		PSG
71	RM-297		7,500	Stainless Steel		
72	RM-123	Neodol 23-3 Alcohol	7,500	Stainless Steel		
66		Empty	5,000	Stainless Steel		
73	F-794	Sodium Sulfate Detergent	10,000	Stainless Steel		
<u>FINISHING PLANT (SECOND FLOOR)</u>						
10	F-656	Silicone Product	37,000	Stainless Steel		
59	RM-346	Methyl Formcel	2,000	Stainless Steel		
8	F-488 E-75	Polyethylene Emulsion	3,000	Glass Lined		
9	G-021	Wax Glycerides	3,000	Stainless Steel		
58		Empty	800	Steel		
6			1,500	Glass Lined		
57		Noedel 25 Alcohol	1,000	Glass Lined		
56		Empty	1,000	Stainless Steel		

Table 3. cont.

<u>Tank Number</u>	<u>Product Number</u>	<u>Product</u>	<u>Gallons</u>	<u>Material Construction</u>	<u>Diked</u>	<u>Level Indicator</u>
<u>WEST SIDE OF RESIN PLANT</u>						
111	A-004	Alkyd Resin	30,000		✓	
112	A-030	Alkyd Resin	30,000		✓	
43		Mineral Spirits	20,000		✓	
114	A-030	Alkyd Resin	20,000		✓	
115	A-013	Alkyd Resin			✓	
116	A-006	Nonflammable Alkyd Resin	20,000		✓	
117	S-764	Polyester	20,000		✓	
118		Xylene	20,000		✓	
119	A-033	Xylene Based Alkyd Resin	20,000		✓	
120	A-038	Toluene Based Alkyd Resin			✓	
<u>FINISH PLANT TANK FARM</u>						
39	234	Slack Wax	15,000	Steel	✓	
32	150	Epichlorohydrin	12,000	Steel	✓	LG
20	146	Butanol	14,000	Lined	✓	LG
37		Diethanolamine	6,600	Steel	✓	LG
23	124	2 Ethyl Hexanol	5,000	Steel	✓	LI
		Isopropanol	8,000	Riveted Steel	✓	
16	RM 157	Isopropanol	8,000	Riveted Steel	✓	
15		Diesel Fuel	10,000	Riveted Steel	✓	
14	244	25 Percent Caustic	10,000	Steel	✓	LG
13		50 Percent Caustic	30,000	Steel	✓	LG
		Isopropanol	10,000	Steel	✓	
19	RM 629	1214 Alcohol	10,000	Steel	✓	LG
	RM 902	Isopropanol	10,000	Lined	✓	
85		Mineral Seal Oil	5,000	Fiber Glass	✓	
Tank Farm Dike			35,843	Concrete Block	✓	

Table 3. cont.

<u>Tank Number</u>	<u>Product Number</u>	<u>Product</u>	<u>Gallons</u>	<u>Material Construction</u>	<u>Diked</u>	<u>Level Indicator</u>
28	RM 154	Igepal				
27	RM 151	Tallow Glyceride	8,800	Glass Lined	✓	SG
26	RM 151	Tallow Glyceride	8,800	Glass Lined	✓	NSG
	Secondary Containment Volume		8,800	Glass Lined	✓	NSG
23		Tallow	13,500			
22		Tallow	9,500	Steel	✓	LG
	Secondary Containment Volume		9,500	Steel	✓	LG
24	RM 196	Paraffin	8,500			
25	RM 196	Paraffin	11,400	Steel	✓	SG
			15,000	Steel	✓	SC

Table 4 Potential Solid Waste Management Unit Inventory

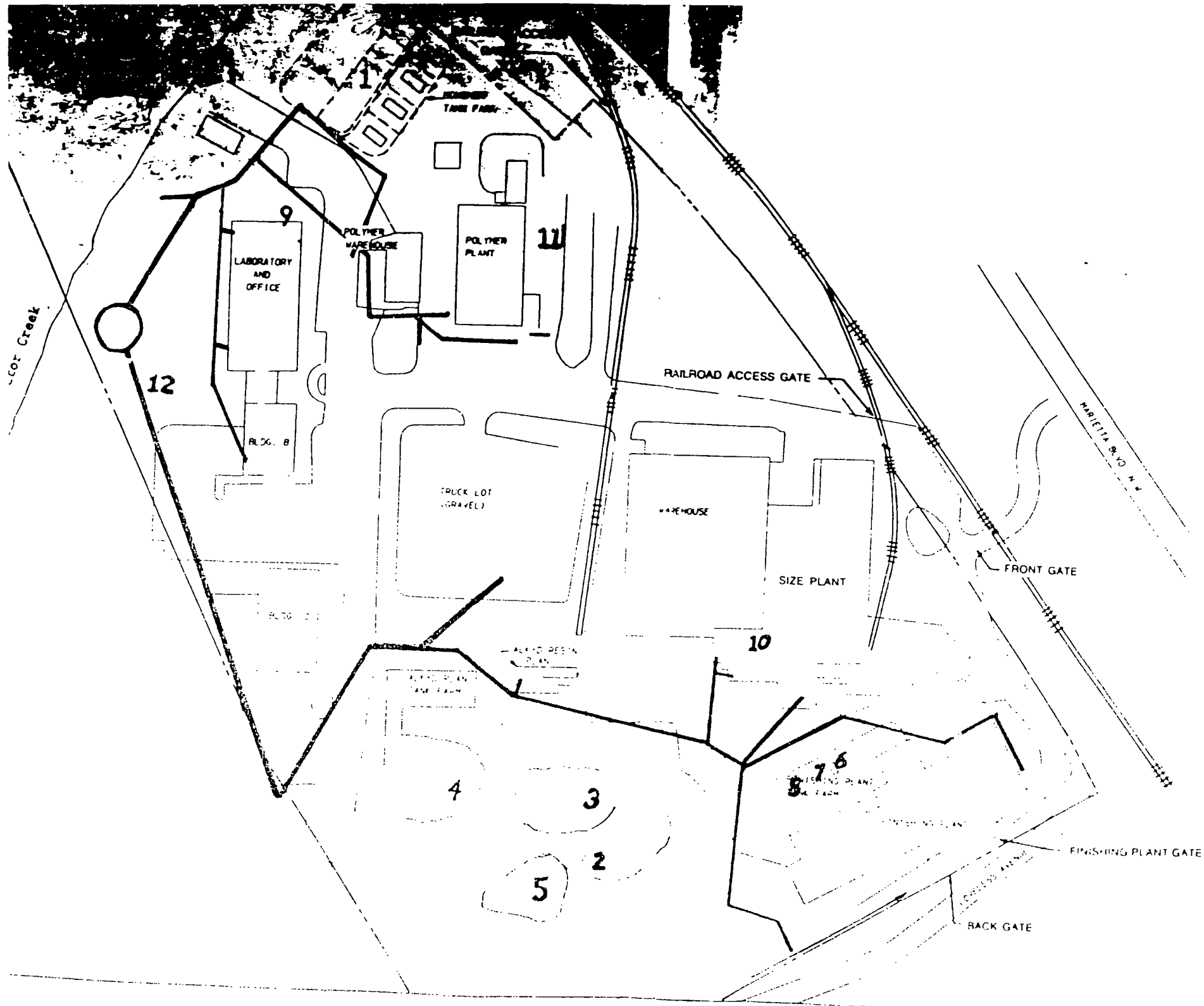
<u>SWMU</u>	<u>Potential for Release</u>	<u>Suggested Further Action</u>
Polymer Pond	Gunnite-lined walls but no bottom. Releases to groundwater from the unit occurred when the impoundment was in use between 1965 and 1985. Documentation of specific wastes disposed is incomplete. Wastes were removed and an impermeable cap placed over the top in 1986-1987.	Since the unit will be under a RCRA remedial program, no further action is recommended.
Acid Pond	No liner. Releases to groundwater from the unit occurred when the impoundment was in use from the 1950s to 1985. Documentation of wastes is incomplete but wastes were removed and the impoundment capped in 1986-1987.	Included in a RCRA remedial program designed for entire series pond area, so no further action is recommended.
Settling Pond	No liner. Releases have occurred since use beginning in early 1950. Wastes removed and impoundment capped in 1986-1987.	Included in the series pond remedial action (RCRA) so no further action is recommended.
Alkyd Pond	No liner. Releases have occurred since construction in 1972-1973. Waste removed and impoundment capped in 1986-1987.	Included in series pond remedial action (RCRA) so no further action is recommended.
Abandoned Pond	No liner. Unknown history, use ceased before 1960s. Waste undocumented. Waste removed and the impoundment capped in 1986-1987.	While not RCRA regulated, pond has been included in series pond remedial action. No further action is recommended.
Waste Fuel Tank No. 17	The tank is not equipped with a level indicator but has a secondary containment system to contain accidental spills or overflows.	No further action is recommended, except changes to manifest methods.

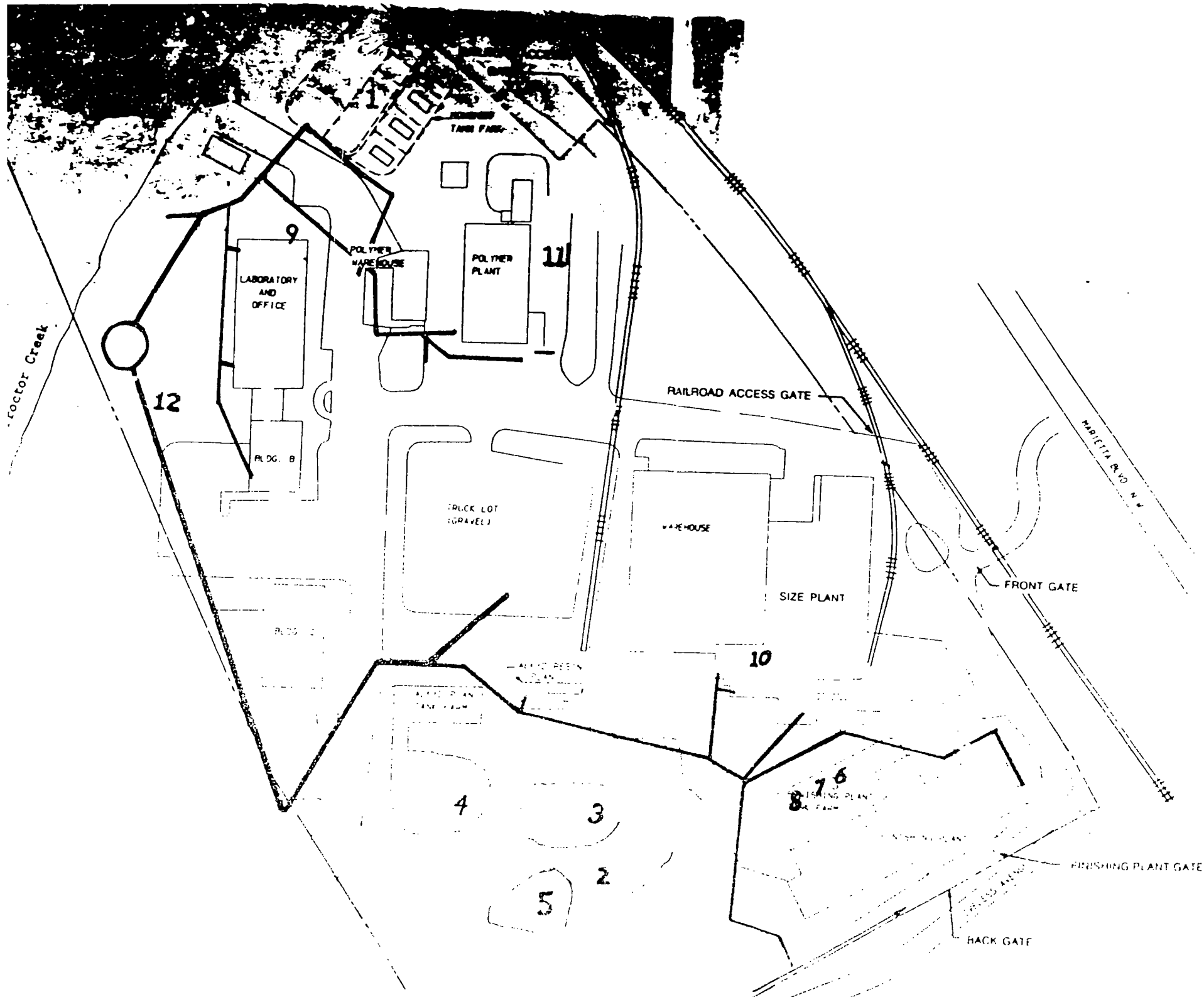
Table 4 Potential Solid Waste Management Unit Inventory

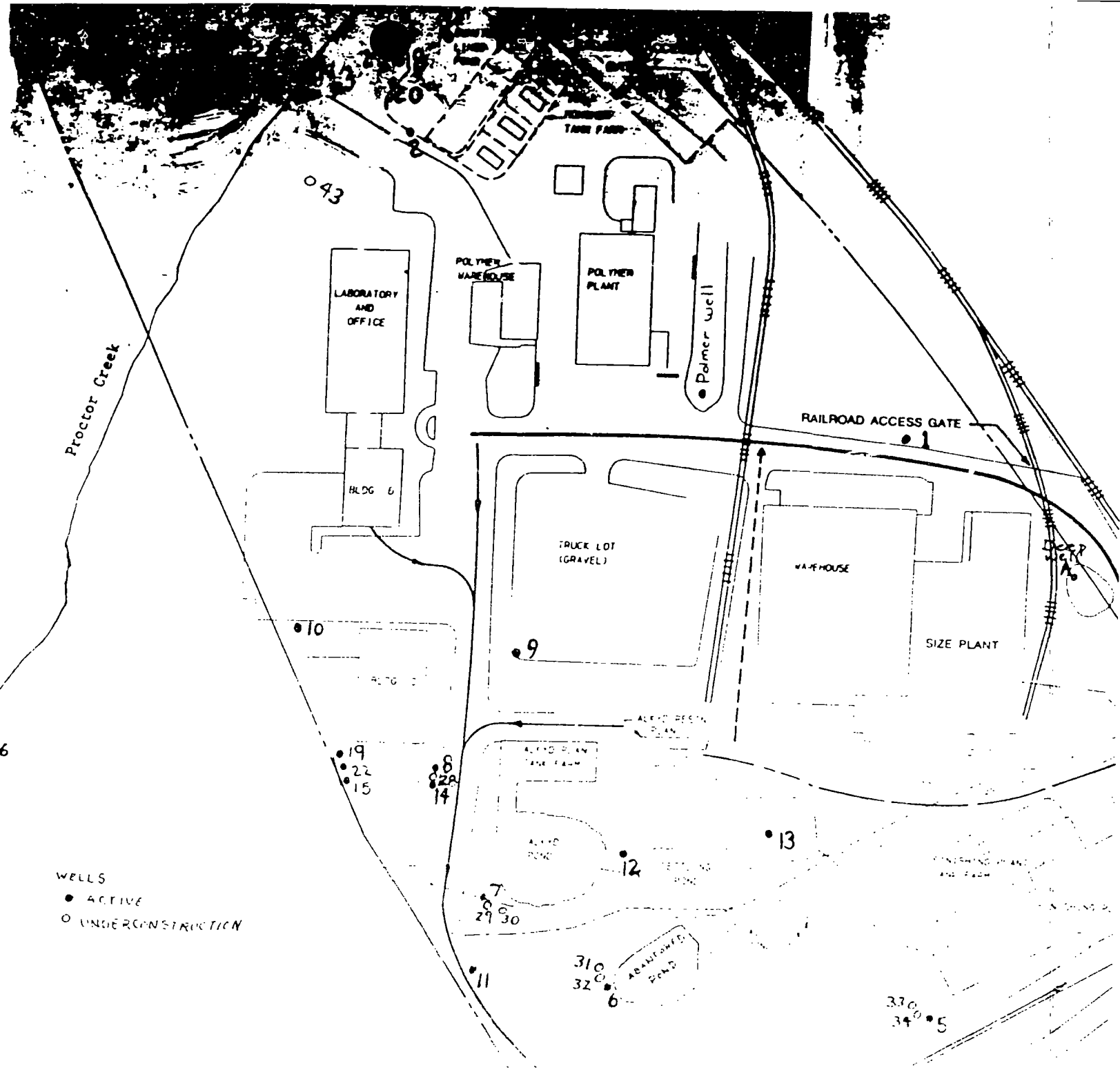
<u>SWMU</u>	<u>Potential for Release</u>	<u>Suggested Further Action</u>
Waste Fuel Tank No. 17	Inspected 12 times/day. Emptied every 30 days. The potential for release to all pathways is little or none. But, AZS needs to maintain records of specific contents and not just manifest as D001.	
Recovered MIBK Tank No 18.	No level indicator. Has a secondary containment system for accidental spills or overflows. Potential for release probably low, but it is suspected that the unit may be applicable to RCRA storage regulations.	Request proof of exemption from RCRA.
Recovered Epichlorohydrin Tank No. 29	Equipped with a level indicator and a secondary containment system. Potential for release probably low, but it is suspected that the unit may be applicable to RCRA storage regulations.	Request proof of exemption from RCRA.
R & D Lab Satellite Accumulation Area	Limited to no more than 55 gallons total of hazardous waste. Outside but protected on a raised platform, but wastes not identified to specific chemical, or separated to prevent mixing of incompatibles if an accident occurred. No secondary containment system. Release probably low.	The facility shall review and correct waste identification procedures and separation of incompatibles.
Q&A Lab Satellite Accumulation	Limited to no more than 55 gallons total of hazardous waste. Protected inside of building. Release probably low.	No further action required.

Table 4 Potential Solid Waste Management Unit Inventory

<u>SWMU</u>	<u>Potential for Release</u>	<u>Suggested Further Action</u>
Outside drum storage area east of polymer plant.	55 gallon drums store solid waste prior to removal off site for disposal. Recovered epichlorohydrin and MIBK have been observed. Also phthalic anhydrite used charcoal, spent nickel catalyst, filter cake used lubricating oil and styrene contaminated emulsion polymer. March 20 inspection noted few drums were labelled, and some drums were in poor condition (rust and scaling). Area is not diked, although storm drains service the area. There is potential for releases to groundwater and surface water.	Request further information and proof of adequate recycling. The facility shall review container management practice to assure the quality of the ground or surface waters are not impaired (391-3-3-.04 of Georgia Rules for Solid Management).
Underground Wastewater Pipes	There is no indication of a release from the surface. A potential for release exists.	Request facility to evaluate leakage potential.







WELLS
● ACTIVE
○ UNDER CONSTRUCTION

001

SOUTH
STORM
OUTFALL

STORM
DIVERSION
BOX

LABORATORY
AND
OFFICE

BLDG. B

BLDG. C

POLYMER
WAREHOUSE

POLYMER
PLANT

TRUCK LOT

WAREHOUSE

SIZE PLANT

ALKYD PLANT
TANK FARM

ALKYD
POND

SETTLING
POND

ACID
POND

ALKYD RESIN
PLANT

FINISHING PLANT
TANK FARM

FINISHING PLANT

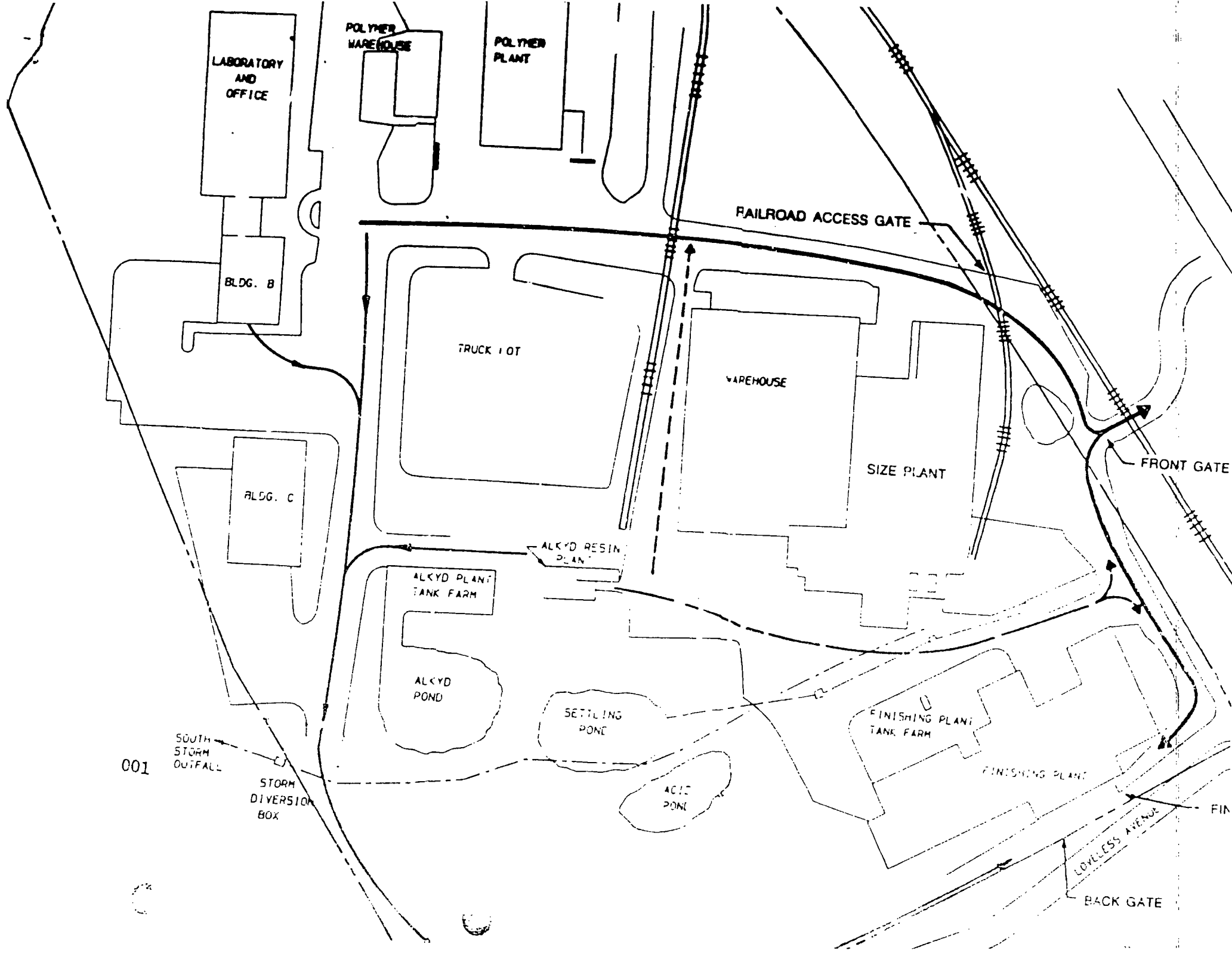
RAILROAD ACCESS GATE

FRONT GATE

BACK GATE

LOVELL AVENUE

FIN



Georgia Department of Natural Resources

2 Martin Luther King Jr. Drive, SE, Suite 1462 East, Atlanta, Georgia 30334

Noel Holcomb, Commissioner

Environmental Protection Division

Carol A. Couch, Ph.D., Director

Hazardous Sites Response Program

404/657-8600

October 26, 2006

MEMORANDUM

TO: Alexandra Y. Cleary

FROM: Kelly Norwood

RE: Recommendation not to List on the Hazardous Site Inventory
Former Cargill, Inc. Site
762 Marietta Blvd.
Atlanta, GA (Fulton County)

COPY

This site was historically owned by AZS Corporation, who retained ownership of portions of the site for RCRA groundwater remediation purposes. The groundwater contamination associated with the former AZS Corporation is regulated under the RCRA Corrective Action Program. As this entire site was historically a single permitted RCRA facility owned by AZS, any future cleanup required for any part of the Cargill or AZS properties may be addressed under the RCRA permit and RCRA Corrective Action Program.

The Hazardous Sites Response Program (HSRP) received a forth release notification for the above-referenced site on July 5, 2006, for a release of tetrachloroethene (PCE) in groundwater above the MCL. The release of PCE to groundwater was discovered during a routine sampling at the RCRA facility. While PCE is a known contaminant at the RCRA facility, since this new contamination was found in one of the up-gradient wells at the facility, it is assumed to be from an up-gradient source. The PCE was detected at 0.140 mg/l, above MCL of 0.005 mg/L.

The groundwater pathway was scored based on a release of PCE (toxicity = 4) to groundwater, of unknown quantity (4), greater than the MCL (4). EPD performed a water well survey in 2004 for a previous notification at this property. No drinking water wells were found within 3 miles of the site; however, conservatively the site was scored as having no drinking water wells within 1 mile of the site (4). The resulting groundwater pathway score is 6.50, which is less than the threshold value of 10.

Since surface soil was not sampled at the site, the on-site exposure pathway was evaluated as having a suspected release of PCE (toxicity = 4) to the soil at the site. The site has unlimited access (4). Since there is no known cover on this portion of the site, the containment was conservatively assessed as having no cover with contamination at 0-6 inches (5). The distance to the nearest resident is less than 300 feet from the site (8). There are no known sensitive areas on site (0). The resulting score for the on-site pathway is 19.75, below the threshold of 20.

Since neither the on-site pathway score nor the groundwater pathway score exceeds the respective threshold values (10 and 20 respectively), this site is not recommended for listing on the Hazardous Site Inventory.

Georgia Department of Natural Resources

2 Martin Luther King Jr. Drive, SE, Suite 1462 East, Atlanta, Georgia 30334

Noel Holcomb, Commissioner

Environmental Protection Division

Carol A. Couch, Ph.D., Director

Hazardous Sites Response Program

404/657-8600

June 1, 2005

MEMORANDUM

TO: Alexandra Y. Cleary

FROM: Kelly Norwood

RE: Recommendation not to List on the Hazardous Site Inventory
Former Cargill, Inc. Site
762 Marietta Blvd.
Atlanta, GA (Fulton County)

COPY

This site was historically owned by AZS Corporation, who retained ownership of portions of the site for RCRA groundwater remediation purposes. The groundwater contamination on the AZS portions of the site is regulated under the RCRA Corrective Action Program. As this entire site was historically a single permitted RCRA facility owned by AZS, any future cleanup required for any part of the Cargill or AZS properties may be addressed under the RCRA permit and RCRA Corrective Action Program.

The site was previously evaluated in March and May 1995 for potential listing on the HSI when soil and groundwater samples at the site identified a release of methylene chloride (soil and groundwater), benzene (soil), MEK (soil), 1,1,2,2-Tetrachloroethane (soil), and carbon disulfide (soil). Based on the absence of a drinking water well within one mile of the site, the presence of a completely encompassing fence and the presence of 24-hour security, the site did not score high enough on either the groundwater pathway or on-site pathway to be listed on the HSI.

A second notification for the site was received on May 7, 2004. This notification showed additional sampling was conducted in 2004 and no additional soil contamination was identified at the site; however, 2004 samples were not collected from 1995 previous sample locations. Based on the continued existence of the completely encompassing fence, the on-site pathway again did not score high enough for the site to be listed on the HSI.

The Hazardous Sites Response Program (HSRP) received a third release notification for the above-referenced site on April 15, 2005. The site fence was removed in early 2005. During this most recent sampling event each of the previously contaminated soil areas were re-sampled. Three soil samples were collected around each of the 1995 soil sample locations. Personnel from the initial 1995 sampling were on hand during the 2005 sampling to confirm the locations of the 1995 samples. Additionally, no contamination was identified above the detection limits listed in the analytical report. Soil sampling yielded no contamination above the respective notification concentrations. Based on the absence of soil contamination above the notification concentration, the resulting on-site pathway score is 0, which is less than the threshold for that pathway.

Since there have been no changes to the groundwater pathway, the 1995 groundwater pathway score of 1.8 is still acceptable.

Since neither the on-site pathway score nor the groundwater pathway score exceeds the respective threshold values (10 and 20 respectively), this site is not recommended for listing on the Hazardous Site Inventory.

Georgia Department of Natural Resources

2 Martin Luther King Jr. Drive, SE, Suite 1462 East, Atlanta, Georgia 30334

Noel Holcomb, Commissioner

Environmental Protection Division

Carol A. Couch, Ph.D., Director

Hazardous Sites Response Program

404/657-8600

September 21, 2004

MEMORANDUM

TO: Alexandra Y. Cleary

FROM: Kelly Norwood

RE: Recommendation not to List on the Hazardous Site Inventory
Cargill, Incorporated
1263 Loveless Avenue
Atlanta, GA (Fulton County)

COPY

The Hazardous Sites Response Program (HSRP) received a release notification for the above-referenced site on May 7, 2004. The site was previously evaluated in March and May 1995 for potential listing on the HSI when soil and groundwater samples at the site identified a release of methylene chloride (soil and groundwater), benzene (soil), MEK (soil), 1,1,2,2-Tetrachloroethane (soil), and carbon disulfide (soil). Based on the absence of a drinking water well within one mile of the site, the presence of a completely encompassing fence and the presence 24-hour security, the site did not score high enough on either the groundwater pathway or on-site pathway to be listed on the HSI.

This site was historically owned by AZS Corporation, who retained ownership of portions of the site for groundwater remediation purposes. The groundwater contamination on the AZS portions of the site is regulated under the RCRA Corrective Action Program. As this entire site was historically a single permitted RCRA facility owned by AZS, any future cleanup required for any part of the Cargill or AZS properties may be addressed under the RCRA permit and RCRA Corrective Action Program.

The recent notification detailed additional soil sampling at the site intended to duplicate sampling from the 1995 notification. No soil contamination was identified in any of the samples collected during the recent sampling event; however, following a review of the most recent sampling event documentation and a site visit, it was noted that many of the new sample locations were not directly adjacent to old locations. Furthermore, additional potential source areas were identified at the site that were not addressed in either the old or more recent sampling reports.

The notification requested re-evaluation of the site noting the desire to remove the fence and clear the site for residential purposes. However, since the fence is still in place, and the site determination to develop the property as residential has not been confirmed, the site must be re-evaluated for listing on the HSI based on actual site conditions.

Since the most recent samples were not collected at the former sample locations, the old sample results were used to re-assess the site. No new additional information was obtained during this investigation that would change the scoring for either the groundwater or on-site pathways; therefore, the old scores (1.8 for groundwater and 0 for on-site) are still acceptable.

Since neither the groundwater pathway score nor the on-site pathway score exceeds the respective threshold values (10 and 20 respectively), this site is not recommended for listing on the Hazardous Site Inventory.

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Drive, SE, Suite 1462 East, Atlanta, Georgia 30334

Lonice C. Barrett, Commissioner

Environmental Protection Division

Carol A. Couch, Ph.D., Director

404/657-8600

TRIP REPORT

July 2, 2004

SITE NAME/LOCATION: AZS Corporation (formerly Cargill, Inc. Site)
1263 Loveless Avenue
Atlanta, GA

COUNTY: Fulton

TRIP BY: Kelly Norwood, Geologist
Alexandra Cleary, Unit Coordinator

COPY

DATE OF INVESTIGATION: July 1, 2004

OFFICIALS CONTACTED: none

SITE BACKGROUND: The site is located at the end of Jefferson Street on the western side of Marietta Boulevard in Atlanta, Fulton County, Georgia. An initial notification for a hazardous waste release at this site was received by EPD in May 1995. Due to a lack of drinking water wells in the area (groundwater pathway) and a fence completely surrounding the site (on-site pathway), this site was not placed on the HSI. EPD received a new notification and report dated May 6, 2004, for the site detailing a plan to remove the surrounding fence, having collected additional soil data.

On May 26, 2004, Ned Stone performed the site notification inspection citing that the fence was still in place around the site; however, public access to the site is limited due to breaches in the fence, and that shacks on the site were being used as residences.

Analysis of soil at the site during the 1995 assessment concluded that benzene, MEK, methylene chloride, and 1,1,2,2-tetrachloroethane were above the notification concentration. The most recent soil samples were generally collected in similar areas as the old soil samples; however, not all of the previous sample locations were duplicated in the recent sampling events. In fact, several locations indicating the greatest soil contamination were not duplicated in the recent sampling events.

FINDINGS: Kelly Norwood and Alexandra Cleary performed this additional site visit to assess the need for further sampling at the site.

Access to the site is from Jefferson Street. The road entrance to the site is gated. At the time of the inspection a drilling crew working at the site granted site access to EPD.

The site is overgrown with vegetation including grasses, small trees, and briars. The roadways and former building foundations allowed vehicular access to most of the site areas. Several railroad spurs that were not reported in the notification report were also noted on the site. One private individual was observed crossing the site along one of the railroad spurs. This confirms that public access to the site is a likely everyday occurrence. Each of the three general locations, which had previous soil detections above

the notification concentration were observed. Sumps were observed in two of these three locations [the southernmost location and the northernmost location (see attached maps)].

Additionally, there were intake pipes, used to connect to rail tanker cars for unloading fluids, adjacent to the railroad spur near the northernmost location. This area of the site was a likely tank storage area. No recent samples were collected adjacent these intake pipes.

Several truck loading/unloading docks were noted at several of the former building locations. Many of the impact cushions were still in place. No soil sampling was conducted adjacent to these areas; however, the report does not specify the use of these docks and the former warehouses adjacent to the docks.

One of the two ponds (impoundments) at the site is in remediation under the RCRA Corrective Action group (Facility ID #GAD981237225). A groundwater pump and treat system was observed adjacent to the southernmost pond. Two out of the three recovery wells were observed nearby the recovery system. The impoundments were filled and grassed at the time of this inspection.

RECOMMENDATIONS/FOLLOW-UP: RQSM scoring required.

REVIEWED BY:

ATTACHMENT: Maps showing 1995 sampling most recent sampling locations and analysis.

TRIP REPORT

SITE NAME AND LOCATION: Cargill Facility

EPA ID NUMBER: None

TRIP BY: Ned Stone, Geologist II

DATE OF INVESTIGATION: May 26, 2004

OFFICIALS CONTACTED: None

COMMENTS:

COPY

I. Background

The facility produced a variety of Chemicals over an 80 year period. Two closed waste impoundments in the southwest corner of the facility are regulated under RCRA and are currently in corrective action (groundwater pump and treat). The remainder of the site has been evaluated under HSRA. Previous (1995) studies found VOCs in soil at the site, however it failed to score due to a fence around the site. More recent (2001) samples reportedly do not show these constituents and it is proposed that natural attenuation has occurred. The current owner wishes to redevelop the site and has asked that it be rescored with new soils data and no fence.

II. Findings

The site is in an economically depressed area with industry, low-income single family residences, a Fulton County Sheriffs facility and associated bail bondsmen, many rail lines, and a significant homeless population.

The facility is bounded on the northeast by the Norfolk Southern Railroad; on the west by Marta tracks and woods; on the South by the Bankhead Center office development, and a wooded area semipermanently occupied by squatters. The squatters occupy shacks that may originally have been equipment sheds for an abandoned cemetery. Loveless Avenue, the address of record for the site, no longer exists; access is through a gate on Jefferson St east of the property.

At the time of the site visit, GA Power was onsite for a power line survey and Dobbs Environmental was performing sampling associated with the RCRA remediation. The Jefferson St gate was open and a vehicle tour of the site possible. The site contains building foundations and deteriorated roadways but no intact structures. There are monitor wells throughout the site and active recovery wells near the closed impoundments. The Jefferson St gate is normally locked and vehicle access impossible; however a nearby open gate and reported breaks in the fence allow easy pedestrian access. Well worn footpaths and at least one squatter's encampment were observed.

Although this brief tour clearly cannot address soil contamination completely, no obvious signs (oil stains, distressed vegetation) of soil contamination were observed.

The nearest residence is at 743 Rice St slightly less than 300' from the facility. NW Early Learning Center is located about 1000' south of the facility. The nearest permanent

surface water feature is Proctor Creek about 500 feet west of the facility. No drinking water wells were observed, although local conditions make assuring their absence difficult. The area is served by City of Atlanta water (Quana Caldwell, pers. comm., 1996).

Much of rescoring will involve review of the new sampling data. That review is beyond the scope of this report. However the author noted one assertion, that chlorobenzene is a petroleum related substance, which he cannot corroborate.

CONCLUSIONS AND RECOMMENDATIONS:

Conditions at this site differ from those presented in the HSRA scoring in these ways: the site is not currently secured from pedestrian traffic; the nearest permanent residence is less than 300 feet away; and squatters are present on and near the site. These findings should be incorporated into the rescoring.

PHOTOGRAPHS: None

SAMPLES TAKEN: None

REVIEWED BY: _____

FILE: s:\rdrive\ned stone\hsra\ Cargill trip report

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Drive, SE, Suite 1154E, Atlanta, Georgia 30334-9000

Noel Holcomb, Commissioner
Environmental Protection Division
Carol A. Couch, Ph.D., Director
Hazardous Waste Management Branch
Phone 404-656-7802 FAX 404-651-9425

December 5, 2007

TRIP REPORT

COPY

Site Name and Location:

AZS Corporation
762 Marietta Boulevard
Atlanta, Fulton County, GA 30318

EPA I. D. Number:

GAD981237225

Trip by:

Thomas J Brodell, QEP, Environ. Engineer *TJB*

Date of Trip:

November 29, 2007

Accompanied by:

Larry Papetti, Senior Geologist
Luis Medina, Environmental Specialist

Reference:

Permit HW-051(D)

Purpose of Trip:

Reconnaissance in support of a CERCLA
Preliminary Assessment

Comments:

The purpose of this trip was to perform a reconnaissance of the AZS Corporation site in support of a Preliminary Assessment pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) under contract to the US EPA. This report addresses only RCRA related issues observed at the site, and the results of the Preliminary Assessment are addressed by Larry Papetti in a separate report.

The most recent Compliance Evaluation Inspection (CEI) was conducted September 24 and 27, 2007. Deficiencies observed during that inspection were transmitted verbally to Dobbs Environmental, AZS Corporation's environmental consultant (who also serves as the Authorized Representative under 40 CFR 270.11 for Tosoh America, AZS Corporation's corporate parent). The EPD's written findings, however, had not been transmitted to the owners prior to the reconnaissance.

Background:

The AZS facility is closed and no buildings exist on-site other than a single open-sided shack for the groundwater treatment system equipment, and several shacks built and occupied by indigents living on the site.

The site operated as a specialty organic chemical manufacturing facility from the early 1900s. In 1972 the Seydel-Woolley & Co. merged with AZ Products and became AZS Chemical Company, Div. of AZS Corporation.

AZS possessed Hazardous Waste Facility Permit No. HW-051 (D), which expired on September 30, 1997, for post closure care of four out-of-service impoundments. Three of these

impoundments (the Neutralization, Settling and Skimming) were coupled together and regulated collectively as one regulated unit called the Series Pond Area. The fourth impoundment was regulated as a second regulated unit called the Polymer Pond. Directly adjacent to the Series Pond Area was an additional abandoned surface impoundment that was closed prior to RCRA and therefore not included in the regulated Series Pond Unit.

In both of the regulated units, AZS disposed of F002, F003 and F005 hazardous wastes. Because it was not feasible to remove all of the hazardous waste from the Polymer and Series Ponds prior to closure, both waste management units were closed in June 1987 as hazardous waste landfills.

The corrective action program, a pump and treat system, is currently focused on the remediation of the groundwater contaminants associated with the closed Series Ponds. The pump and treat system consists of three recovery wells and a carbon treatment system. A fourth recovery well exists for the Polymer Pond, but is no longer in use.

Reconnaissance /Observations:

Upon arriving at AZS, EPD personnel inspected the gates and fence at the entrance of the facility. Upon determining the fencing contained large holes with footpaths leading to the holes, the main gate was partially open, and no warning signs were posted against entry or trespass (see Photo #s 01 – 05), EPD inspectors entered the site through the main gate.

During the reconnaissance, EPD Inspectors sought evidence of corrective actions by AZS or its consultant to correct deficiencies identified during the 2007 CEI. While all deficiencies concerning site conditions were communicated verbally to AZS's consultant during the 2007 CEI closing, the only action observed by EPD inspectors during the reconnaissance to correct those deficiencies was the restoration of the power to the groundwater treatment system (see Photo #s 34 – 36).

The facility continues to be occupied by indigents. In total, at least nine encampments were observed on-site with another six observed within ¼ mile of the closed hazardous waste units (details of the encampments and their locations are contained within Mr. Papetti's report). One shelter is present approximately 15 yards from the background monitoring well, and the area of the well continues to be used as a restroom facility.

Security at the site continues to be non-existent, and access to the site is unrestricted, based upon the following observations:

1. There were no signs observed warning against trespassing or entry. The only signs observed were three signs stating "Authorized Personnel Only" posted on the structure of the open-sided shelter housing the groundwater treatment system.
2. Nine encampments by indigents were observed on the site (see Mr. Papetti's report for detailed locations)
3. Holes were observed in the fence at several locations:
 - i. the front entrance of the facility (see Photo # 04),
 - ii. three locations along the southern fence line,
 - iii. on the western fence line under the new GA Power transmission line where the fence was buried under fill brought in to allow access by GA Power vehicles to the right-of-way, and

- iv. on the eastern fence line along the active railroad tracks near the northern tip of the property.
4. The main gate was unlocked and open (see Photo # 05), and the gate for the eastern split of the rail siding was found unlocked and open (see Photo # 10). The gate for the eastern split of the rail siding is blocked from closing by vegetation, including a tree with a 2 – 3 inch diameter trunk.

The cap of the closed Polymer Pond unit could not be adequately inspected due to overgrowth. There were, however, several issues observed:

1. The top of the unit has not been mowed for several months. Grass is calf- to knee-high depending upon the area of the cap that one stands upon, and appears to be laying down due to the change in weather rather than having been cut. Photo #s 13 and 16 show the condition of grass at the point of compliance wells adjacent to the cap. The condition of the grass in these photos is representative of the condition of grass on the cap.
2. The chemical transport hose observed during the CEI attached to a submerged pipe immediately adjacent to (or perhaps on) the cap remains present.
3. Trees that were observed growing on the cap during the CEI remain present.

The cap of the closed Series Pond unit also could not be adequately inspected due to overgrowth. There were, however, several issues observed:

1. The top of the unit has not been mowed for several months. Grass is calf- to knee-high depending upon the area of the cap that one stands upon. (see Photo #s 30 and 37).
2. A sinkhole was observed on or adjacent to the cap near MW-13 (see Photo #s 28 and 29).

The drums observed on-site during the 2007 CEI (see Photo #s 07, 08, 11, 22, 23, 25 and 26) remain on-site. One drum (see Photo # 22) continues to exhibit clear evidence of corrosion and salt formation on the outside of the drum. Three additional drums, apparently filled with solids, were observed during the reconnaissance (see Photo #s 21, 24 and 42), possibly due to the dying off of overgrowth with the colder weather. This raised the total number of drums to ten, eight of which are apparently filled with solids. Except for one drum (see Photo # 11) observed during the 2007 CEI, no labeling was observed, and labeling on this drum remains illegible. All drums were observed on areas of the facility owned by United Real Property.

Three monitoring wells, not listed in any correspondence or reports from AZS, were observed during the reconnaissance that were not observed during the 2007 CEI (see Photo #s 12, 23 and 41). While all three of these wells were observed to lack any identifying label, one is a flush mount well and the other two were observed to be locked. All other monitoring wells observed during the reconnaissance were found unlocked, as were all wells inspected during the 2007 CEI.

The groundwater treatment system was observed to be operational with the restoration of power (see Photo #s 34 – 36) since the 2007 CEI. Pump controllers for Groundwater Recovery Wells R-2, R-3 and R-4 were observed to have electrical power, however, the controllers for R-2 and R-3 were observed in a tripped condition. Brass outdoor water spigots were observed on R-2, R-3 and R-4, and water was produced from R-4, but not R-2 and R-3, when the spigot handles were turned. A butterfly valve found on the treatment system piping was also observed to

produce water when its handle was turned. Vegetation surrounding R-4 was stressed or non-existent and a footpath was clearly worn into the vegetation leading from the area where the majority of indigent encampments were observed to the area of R-4. These observations indicate that the contaminated groundwater from R-4 is likely being used as a source of potable water. Mr. Papetti's report contains additional discussion of these observations along with supporting photos.

Open dumping was observed in several areas of the site. While most areas of the facility showed evidence of litter, several areas showed a small mound (less than one cubic yard) of domestic garbage, sometimes bagged, sometimes not. A tire dump was also observed near the southeastern corner of the property (see Photo # 23). Old industrial tanks, sumps and piping was also observed on-site (see Photo #s 09, 19 and 20). An old well casing was also observed on-site (see Photo #s 13 – 15).

Conclusion:

Conditions at the site pose a direct threat to human health and the environment.

**Recommendations
and Follow-up:**

Send letter requiring immediate correction of conditions posing direct threat to human health and the environment. Letter should be signed by HW Management Branch Chief.

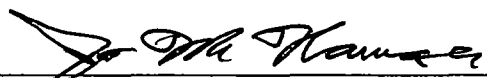
Photographs:

43

Attachments:

One (Photo log)

Reviewed by:



Jim McNamara
Unit Coordinator
Land Disposal Unit

File:

AZS (R)

AZS Corporation Reconnaissance in support of a CERCLA Preliminary Assessment
December 7, 2007

ATTACHMENT A
Photo Documentation



Photo Locations – AZS Corporation – FFY 2007 CEI, CAC & OAM Inspections – September 24, 2007



Photo	01 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Fence at Marietta Boulevard. Locked, but no signs and clearly worn footpaths observed present on each side of fence.						



Photo	02 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Property-line fence, looking approximately NNW. No signs warning against trespass or entry.						



Photo	03 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Property-line fence, looking approximately WSW. No signs warning against trespass or entry. Fence on left side of photo has foot path and hole.						



Photo	04 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Closeup of hole in fence shown in Photo # 03.						



Photo	05 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Gate between Photo #s 01 and 02. Gate partially open and unlocked. No signs prohibiting entry or trespass observed present.						



Photo	06 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Background monitoring well (MW-1). No lock present and area shows evidence of being used as a privy.						



Photo	07 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Empty 55-gallon Drum near former Railroad Siding between former Truck Lot, former Warehouse and former Tank Car Unloading Transfer Center						



Photo	08 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	55-gallon drum filled with solids approximately 10 yards north of the drum shown in Photo # 07. Drum located just off of road surface where it changes from asphalt to concrete.						



Photo	09 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Pipe with quick connect at railroad siding (western split) near former tank farm. Note soil staining under pipe. A second pipe was found alongside track approximately 75 feet to the North.					GPS:	Lat: 33.77665 Long: -84.42815



Photo	10 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Gate (top arrow) at eastern split of railroad siding (bottom arrow points to track rail). Gate is open and existing tree growth is in swing path of gate preventing gate from being fully closed.						



Photo	11 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	55-gallon drum of solids on asphalt roadway between former Laboratory and former Polymer Warehouse. Faded writing on side of drum was undecipherable.						



Photo	12 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Monitoring well found on asphalt roadway between former Laboratory and former Polymer Warehouse, near drum observed in Photo # 11. Well not observed during 2007 CEI.					GPS:	Lat: 33.77665 Long: -84.42815



Photo	13 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Well on left is MW-2, Point Of Compliance Well for Polymer Pond. Cap does not appear to have been mowed since 2007 CEI. Rather, grass appears to have died off due to colder weather.						



Photo	14 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Well housing seen on right of Photo # 13. Well housing not observed during 2007 CEI, possibly due to overgrowth in area.						



Photo	15 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Close up of well housing from Photo #s 13 and 14. Appears to be a former housing for MW-2.						



Photo	16 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	From left to right: MW-20, MW-18, MW-24, RW-1. No wells in photo are locked, and protective casing cap for MW-24 will not close.						



Photo	17 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Second view of MW-18, MW-24 and RW-1, showing no locks present.						



Photo	18 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	MW-16 located cross-gradient of the Polymer Pond. Lock is present, but not locked.						



Photo	19 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Two partially buried tanks located adjacent to and northwest of the former R&D Laboratory and Office. Tanks and vault pictured in Photo # 20 appear to be part of the wastewater pretreatment system.						



Photo	20 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Vault located between tanks pictured in Photo # 19 and the former R&D Laboratory and Office. Vault and tanks pictured in Photo # 19 appear to be part of the wastewater pretreatment system.						



Photo	21 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Drum with solids not previously observed during 2007 CEI, possibly due to overgrowth. Drum is approximately 20 yards from drum pictured in Photo # 22.					GPS:	Lat: 33.77495 Long: -84.42712



Photo	22 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	55-gallon drum of solids near the former finishing plant diesel fuel tank. No labeling visible and corrosion evident on side of drum with white salt formation. Drum observed during 2007 CEI.					GPS:	Lat: 33.77478 Long: -84.42780

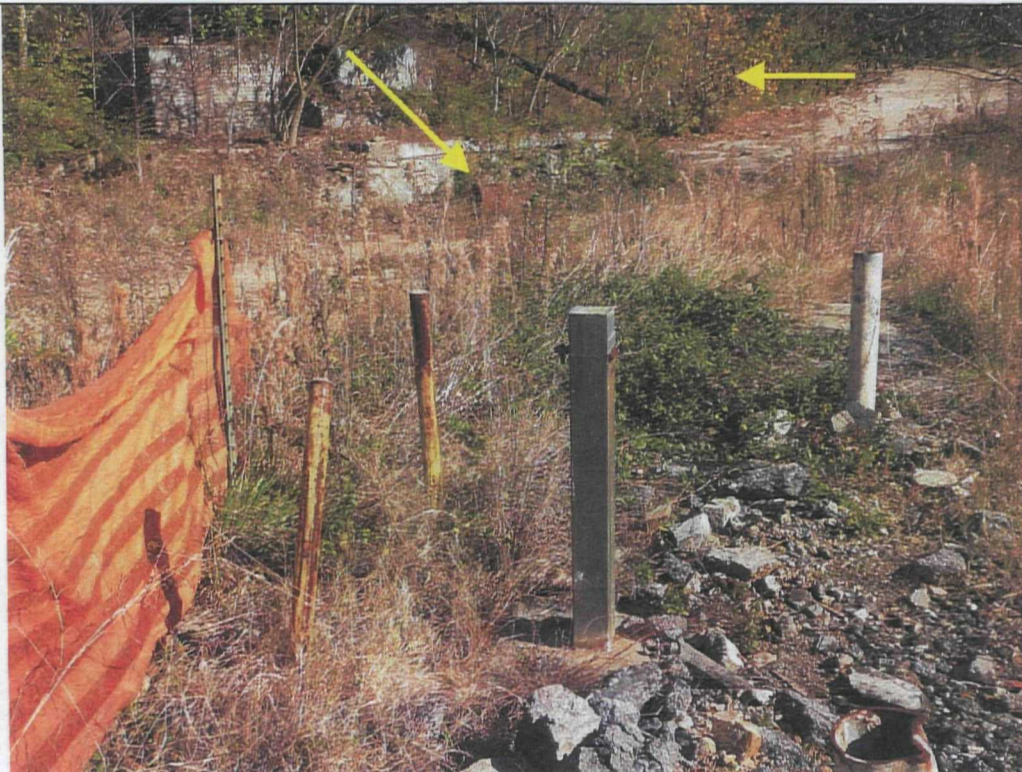


Photo	23 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Unlabeled, locked well found in area of former Finishing Plant Tank Farm. Well was not observed during 2007 CEI. Arrow on left points at drum in Photo # 22, and right arrow points at drum in Photo # 21.					GPS:	Lat: 33.77490 Long: -84.42740



Photo	24 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Drum with solids not previously observed during 2007 CEI, possibly due to overgrowth. Series pond and ground water treatment system visible in background					GPS:	Lat: 33.77478 Long: -84.42780



Photo	25 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	55-gallon drum of solids near MW-13 (see arrow pointing at well). Drum observed during 2007 CEI.						

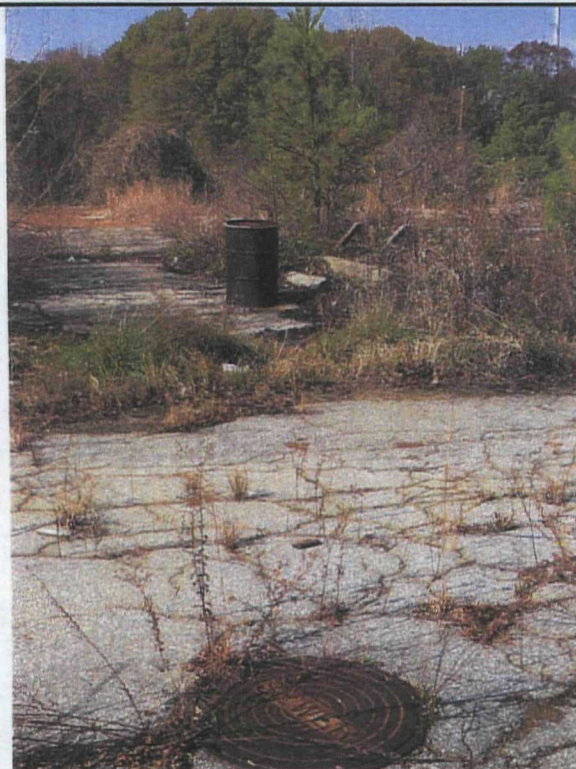


Photo	26 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	55-gallon drum of solids (in background) located next to end of railroad siding that goes between former Truck Lot and Warehouse. Manhole in foreground marked "SEWER". Drum observed during 2007 CEI.						



Photo	27 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Close up of MW-13 with open, rusted lock hanging on well casing.						



Photo	28 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Sinkhole observed on or at edge of Series Pond cap. This photo is first in a panoramic series of three showing location. Sinkhole not observed during 2007CEI, possibly due to overgrowth.					GPS:	Lat: 33.77494 Long: -84.42795



Photo	29 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Second photo in a panoramic series of three, turning counter-clockwise from Photo # 30. Sinkhole is visible in the lower right portion of photo.						



Photo	30 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Third photo in a panoramic series of three looking out over the Series Pond, and turning counter-clockwise from Photo # 29. Wastewater treatment shed visible on left side of photo.						



Photo	31 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	MW-6 (foreground), MW-31 (back, left) and MW-32. None of the wells were locked, however, all three were observed with rusted, open locks hanging on well casings.						



Photo	32 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Rusted, open lock hanging on well casing for MW-31.						



Photo	33 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Rusted, open lock hanging on well casing for MW-32.						



Photo	34 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Groundwater treatment system found operational. Orange extension cord used to supply electricity to sump pump for area within the shed.						



Photo	35 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Groundwater treatment system found operational. Orange extension cord used to supply electricity to sump pump for area within the shed.						



Photo	36 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Electrical meter and panel repaired and in operation. Electrical devices pictured here were observed to be stripped of copper during 2007 CEI.						



Photo	37 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	From left to right: MW-7, MW-29 and MW-30, all observed without locks. The Cap for the Series Pond is visible beyond the riprap in the middle of the photo.						



Photo	38 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	RW-4, newly repaired electrical and piping. Electrical panel and switch in background no longer functional. Arrow points to new non-lockable spigot installed on system piping, and found to be capable of delivering water when opened.						



Photo	39 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	MW-15 and MW-22, both observed without locks						



Photo	40 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	MW-8, MW-28 and MW-14, all observed without locks						



Photo	41 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Unlabeled well found in southeast corner of property, near former gate to finishing plant. Well was not observed during 2007 CEI. Well is locked.					GPS:	Lat: 33.77443 Long: -84.42686



Photo	42 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Drum with solids not previously observed during 2007 CEI, possibly due to overgrowth. Drum located approximately 10 feet from well pictured in Photo # 41.					GPS:	Lat: 33.77454 Long: -84.42686



Photo	43 of 43	Date:	11/29/07	Site Name:	AZS Corporation		
Photographer:	Thomas J Brodell, QEP; HWMB			City:	Atlanta	County:	Fulton
Explanation:	Tire dump found in southeast corner of facility. During inspection, chickens were observed walking around and in front of tires. Green colored tents occupied by indigents faintly visible in background.						

Georgia Department of Natural Resources

205 Butler Street, S.E., Suite 1252, Atlanta, Georgia 30334

Joe D. Tanner, Commissioner
Harold F. Reheis, Director
Environmental Protection Division

March 31, 1993

Maurizio F. Giabbai, Ph.D.
President
Haz Labs Incorporated
2264 Northwest Parkway
Suite F
Marietta, Georgia 30067

COPY

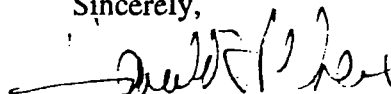
RE: Amendment to Hazardous Waste
Permit No. HW-051 (D)
EPA ID# GAD981237225

Dear Mr. Giabbai:

Enclosed is the Permit Modification issued to the AZS Corporation for Hazardous Waste Facility Permit No. HW-051 (D). The modification amends the permit to assure the facility continues to comply with the currently applicable requirements in 40 CFR Parts 124, 260 through 268 and 270. Changes made to the permit resulted from the five year review performed by the Environmental Protection Division for the land disposal facility.

No comments were received during the public comment period which ended March 29, 1993. The attached Permit Amendment has not been changed from the draft version and is effective immediately. If you have any questions, please contact Norman R. Woodburn at (404) 656-7802.

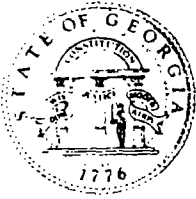
Sincerely,



Harold F. Reheis
Director

HFR/dmb

f:\user\karla\norman\azs.ltr



State of Georgia
Department of Natural Resources
ENVIRONMENTAL PROTECTION DIVISION



AMENDMENT TO
HAZARDOUS WASTE FACILITY PERMIT

Amendment To AZS Corporation
Permit No. HW-051(D)

Effective Date
Of Amendment 3/31/93

In accordance with the provisions of the Georgia Hazardous Waste Management Act and the Rules, Chapter 391-3-11, (as amended through November 18, 1992), adopted pursuant to that Act, Permit No. HW-051(D) issued on 9/30/87 to:

AZS Corporation

for the following:

Post closure care and corrective action for hazardous waste surface impoundments.

Is hereby amended as follows:

By incorporating the modifications on the attached twenty-one (21) pages.

Reason for Amendment:

Five year permit review as required under 40 CFR 270.50(d) to assure the facility continues to comply with the currently applicable requirements in 40 CFR Parts 124, 260 through 268 and 270.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 21 page(s), which page(s) are a part of this Amendment. This Amendment is hereby made a part of Permit No. HW-051(D) and compliance with this Amendment is hereby ordered.

Director
Environmental Protection Division

Permit Number: HW-051(D)

AZS Corporation - Atlanta, Georgia, GAD981237225 is hereinafter referred to as the Permittee.

SECTION I. General Permit Conditions

A. Scope and Effect of Permit

1. The Permittee is allowed to dispose of hazardous waste in accordance with the conditions of this permit. Any hazardous waste treatment, storage or disposal not authorized in this permit is prohibited. The Permittee must comply with the Georgia Hazardous Waste Management Act and the Rules for Hazardous Waste Management, Chapter 391-3-11, which Rules include certain portions of the Federal Hazardous Waste Regulations (found at 40 CFR 260-268, 270, and 124). Where a citation to the Federal Regulations is made in the permit, it refers to the specific regulations adopted by EPD.
2. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.
3. Compliance with this permit does not constitute a defense to any action brought by the Director under Section 18, Emergency Powers, of the Georgia Hazardous Waste Management Act, O.C.G.A. §12-8-75, as amended.
4. Nothing in this permit shall be construed to preclude the institution of any legal action under Section 3008 of the Federal Resource Conservation and Recovery Act or under the Georgia Hazardous Waste Management Act, O.C.G.A. §§ 12-8-81 - 12-8-82, as amended.
5. This permit may be modified, revoked and reissued, or terminated for cause as specified in Rule 391-3-11-.11(7) and §270.41, 270.42, 270.43, 270.50(d) and 270.51(a). The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability of any permit condition.
6. The provisions of this permit are severable, and if any provision of this permit or the application of any provision of the permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

B. Management Requirements

1. The Permittee shall give notice to the Director as soon as possible of any planned physical alterations or additions to the permitted facility or any planned changes in the permitted facility or activity which may result in non-compliance with permit conditions.
2. The Permittee shall maintain at the facility until the expiration or termination of this permit, the ~~following documents and~~ amendments, revisions and modifications to these documents:
 - (a) Complete copy of this permit and permit application, including all amendments, revisions and modifications
 - (b) Inspection Schedule
 - (c) Post-closure care plan including at a minimum:
 - (i) Schedule of monitoring and reporting in accordance with the requirements of Subparts F, K and N of 40 CFR Part 264
 - (ii) Documentation of compliance with §§264.117 through 264.120
 - (d) Proof of financial assurance for post closure care and corrective action as required by 40 CFR 264.145 and the Georgia Hazardous Waste Management Act, O.C.G.A. 12-8-68, as amended
 - (e) Cost estimate for post closure care as required by 40 CFR 264.144
 - (f) Operating records as required by 40 CFR 264.73
3. All amendments, revisions and modifications to any plan or cost estimates required by this permit shall be submitted to the Director for approval and permit modification as necessary.
4. When the Permittee becomes aware that the Permittee failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Director, the Permittee shall promptly submit such facts or information.
5. The Permittee shall at all times properly operate and maintain all facilities which are installed or used by the Permittee to achieve compliance with the conditions

AZS Corporation - Atlanta, Georgia

of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of a back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of this permit.

6. The Permittee may not commence treatment, storage or disposal of hazardous waste at any new or modified portion of the facility or corrective action for contaminated groundwater until the Permittee has submitted to the Director by certified mail or hand delivery an application for a permit modification. No changes to the current permit may be implemented until the Director has modified the permit and an executed copy of the modified permit has been received by the Permittee.

C. Monitoring and Reporting

1. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in the most recent editions of Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW 846; or Standard Method for Examination of Water and Wastewater; sampling and analyses of groundwater samples shall be conducted in accordance with methods and procedures acceptable to the Director as specified in condition II.L of this permit.
2. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit and records of all data used to complete the application for this permit including the certification required by §264.73(b)(9) for a period of at least three (3) years from the date of the sample, measurement, report, or record. These periods are automatically extended during the course of any unresolved enforcement action regarding this facility and also may be extended at any time at the Director's discretion.
3. The Permittee shall maintain records for all groundwater monitoring wells and any

groundwater withdrawal wells, including the associated groundwater surface elevations during the corrective action phase and for the post closure care period.

4. The Permittee shall determine the groundwater ~~flow rate and direction~~ in the uppermost aquifer at the point of compliance as described in condition II.L.2. of this permit at least semi-annually.
5. Records of monitoring information shall include:
 - (a) The date, exact place, and time of sampling or measurements
 - (b) The individual(s) who performed the sampling
 - (c) The date(s) analyses were performed
 - (d) The individual(s) who performed the analyses
 - (e) The analytical techniques or methods used; the method of sample preservation; and quality assurance methods
 - (f) The results of such analyses.
 - (g) The flow directions and flow rates in the uppermost aquifer in accordance with (4) above.
6. The Permittee shall report to the Director or his representative orally within one (1) hour from the time the Permittee becomes aware of any circumstances resulting from the maintenance of the hazardous waste management facility (including periods of noncompliance) which may endanger human health or the environment, including but not limited to:
 - (a) Release of any hazardous waste, hazardous waste constituent, or hazardous constituent that may cause an endangerment to public drinking water supplies.
 - (b) Release or discharge of hazardous waste, hazardous waste constituent, hazardous constituent, or a fire or explosion which could threaten human health or the environment outside the facility.

The description of the occurrence shall include:

- (i) Name, address and telephone number of the owner or operator;
- (ii) Name, address, and telephone number of facility;
- (iii) Date, time and type of incident;

Permit Number: HW-051(D)

AZS Corporation - Atlanta, Georgia

- (iv) Name and quantity of materials involved;
 - (v) The extent of injuries, if any;
 - (vi) An assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and
 - (vii) Estimated quantity and disposition of recovered material that resulted from the incident.
- 7. Within fifteen days of becoming aware of any reportable incident as in C-6 above which may endanger health or the environment, the Permittee shall submit a written report of the incident covering the following:
 - (a) Description of occurrence as in C-6 above
 - (b) Cause of occurrence
 - (c) Period of occurrence, including exact dates and times
 - (d) Time occurrence expected to continue (if not already corrected)
 - (e) Steps taken or planned to reduce, eliminate, and prevent recurrence.
- 8. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.
- 9. The Permittee shall report instances of non-compliance, other than those described in conditions C-6 and C-8, semi-annually on July 15 (covering January 1 - June 30) and January 15 (covering July 1 - December 31). The report shall cover the information requested in Condition C-6 for each incident.
- 10. All reports or other information requested by the Director shall be signed and certified according to the requirements in 40 CFR 270.11.
- 11. The Permittee shall immediately notify the Division through the Department of Natural Resources Emergency Operations Center of any spills or release of oil or a hazardous substance as soon as the Permittee knows of the spill or release, as required by O.C.G.A. §12-14-3.

D. Responsibilities

- 1. Right of Entry. The Permittee shall allow the Director of EPD, and/or his authorized representatives, agents, or employees, upon the presentation of

Permit Number: HW-051(D)

AZS Corporation - Atlanta, Georgia

credentials and other documents as may be required by law to:

- (a) Enter at reasonable time upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
 - (d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Georgia Hazardous Waste Management Act, any substances or parameters at any location.
2. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to §270.41(b)(2) or §270.40(b). Before transferring ownership or operation of the facility the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.
3. Duty to Comply. The Permittee shall comply with all conditions of the permit, except to the extent and for the duration such non-compliance is authorized by an emergency permit. Any non-compliance with this permit constitutes a violation of the Georgia Hazardous Waste Management Act and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or for denial of a permit renewal application.
4. Duty to Reapply. If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must submit a complete application for a new permit at least 180 days before this permit expires. The conditions of this permit continue until the effective date of the new permit if the Permittee has timely filed a complete permit application and the Director, through no fault of the Permittee, does not issue a new permit before the expiration date.

Permit Number: HW-051(D)

AZS Corporation - Atlanta, Georgia

5. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
6. Duty of Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment or human health resulting from non-compliance with this permit.
7. Duty to Provide Information. The Permittee shall furnish to the Director, within a reasonable time, any relevant information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with the permit. The Permittee shall also furnish to the Director, upon request, copies of records required to be kept by this permit.
8. Anticipated Non-Compliance. The Permittee shall give advance notice to the Director of any planned changes in the permitted facility or activity which may result in non-compliance with permit requirements.

E. Definitions

For purposes of this permit, terms used herein shall have the same meaning as those in 40 CFR Parts 124, 260, 264 and 270, unless this permit specifically provides otherwise; where terms are not defined in the regulations or the permit, the meaning associated with such terms shall be defined by standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

1. Hazardous constituents for the purpose of this permit are those substances listed in 40 CFR Part 261 Appendix VIII as revised or superseded.
2. Solid Waste Management Unit for the purposes of this permit includes, but is not limited to, any landfill, surface impoundment, waste pile, land treatment unit, incinerator, injection well, tank (including storage, treatment, and accumulation tanks), container storage unit, wastewater treatment unit, including all conveyances and appurtenances used in waste management or storm water handling, elementary neutralization unit, transfer station, or recycling unit from which hazardous waste, hazardous waste constituents or hazardous constituents might migrate, irrespective

Permit Number: HW-051(D)

AZS Corporation - Atlanta, Georgia

of whether the units were intended for the management of solid and/or hazardous waste.

3. Release for the purposes of this permit includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment of any hazardous waste or hazardous constituents.
4. Contamination for the purposes of this permit refers to the presence of any hazardous waste or hazardous constituents in a concentration which exceeds the naturally occurring concentration of that waste or constituent in the immediate vicinity of the facility (in areas not affected by the facility), unless an alternate groundwater protection standard has been established.
5. Corrective action for prior or continuing releases from solid waste management units, as well as for other releases as described in 3. above, for the purposes of this permit shall be as specified in 40 CFR §264.101 and may include "corrective action" as provided for in 40 CFR §264.100, and other remedial actions for any environmental media as deemed appropriate by the Director to protect the health of humans or the environment.
6. Land Disposal Facility: A facility that uses a surface impoundment, landfill, land treatment or waste pile to manage or dispose of hazardous waste pursuant to §12-8-66 of the Georgia Hazardous Waste Management Act, as amended, and §3004 of RCRA, as amended.

F. Conditions Related to Compliance with General Facility Standards
(40 CFR Part 264 Subparts B, C, D, E, G, H)

1. The Permittee must follow the procedures and plans described in detail in the permit application dated ~~February 27, 1987~~, as amended, which are hereby incorporated by reference and include at least the following:
 - Post-Closure Plan, Section B
 - Groundwater Monitoring Program, Section C
2. The following activities must be carried out as prescribed in 40 CFR Part 264 Subparts B, C, D, and E, and in accordance with the appropriate Sections of the

Permit Number: HW-051(D)

AZS Corporation - Atlanta, Georgia

permit application.

- Repairs and Inspection Log - 264.15(c) and (d)
 - Operating Record - 264.73 and Disposition of Records - 264.74
 - Reports - 264.75 and 264.77
3. The following activities must be carried out as prescribed in 40 CFR Part 264 Subpart G and H and Section F of the permit application.
- Post closure care and use of property - 264.117
 - Post closure plan, amendment of plan - 264.118
 - Notice to local land authority and in deed to property - 264.119 and 264.120
 - Financial Assurance for Post-Closure. Continuous compliance with 264.145 must be maintained by the Permittee for the amount of the cost estimate for post-closure and corrective action as required by 264.144 until released by the Director as provided in 264.145(i).
4. The Permittee must comply with §264.148 whenever necessary.

G. Special Conditions Applicable to Entire Facility

1. Waste Minimization - The Permittee shall be required to certify no less often than annually that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the Permittee to be economically practicable, and the proposed method of treatment, storage or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment in accordance with 40 CFR §264.73(b)(9).
2. The terms and conditions of this Permit become effective upon the receipt by the Director of the Permittee's certification of closure for the surface impoundments.

Permit Number: HW-051(D)

AZS Corporation - Atlanta, Georgia

SECTION II. POST-CLOSURE CARE OF SURFACE IMPOUNDMENTS AND CORRECTIVE ACTION FOR SURFACE IMPOUNDMENTS

H. Unit Identification:

The Permittee shall provide post closure care for two (2) hazardous waste management units identified as the Polymer Pond Area, which includes the Polymer Pond surface impoundment, and the Series Pond Area, which includes the Neutralization, Settling, Skimming and Abandoned surface impoundments. All wastes and some contaminated soil have been removed from each impoundment. Closure of each impoundment was completed with the installation of an impermeable cap.

I. Waste Identification:

The permittee had disposed of hazardous waste numbers F002, F003 and F005 in the units as described in the Part A permit application dated October 8, 1985. The units are being closed with some wastes left in place.

J. Monitoring and Inspection:

1. The Permittee shall follow the inspection schedule as discussed in Section B and C of the permit application and as required by 40 CFR 264.15(a).
2. The Permittee shall inspect the landfills at least quarterly and after storms to detect any evidence of deterioration or improper operation as described in Sections B and C of the permit application and as required under §264.15 and §264.310.

K. Post Closure

The Permittee shall perform post closure care for the landfills in accordance with the post closure plans in Section B and C of the permit application and as required by 264.310.

L. Groundwater Monitoring

1. Well Location and Construction

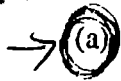
The Permittee shall install and/or maintain a groundwater monitoring system to

Permit Number: HW-051(D)

AZS Corporation - Atlanta, Georgia

comply with the requirements of §§264.95, 264.97 and 264.100 as specified below:

Semi Annually



(a) The Permittee shall maintain the following groundwater monitoring wells as referenced in the permit application.

i. Uppermost Aquifer

*MW-1 ✓	MW-8 x	MW-15 ✓	MW-25	MW-31 ✓
MW-2	MW-9	MW-16	MW-26	MW-32
MW-3	MW-10 x	MW-20 ✓	MW-27 x	MW-33
MW-5	MW-11 ✓	MW-22	MW-28 x	MW-34
MW-6 ✓	MW-13 ✓	*MW-23 x	MW-29 x	MW-35
MW-7 x	MW-14 x	MW-24	MW-30 x ✓	

* Upgradient Well

tot 42 wells

*53 x
BB-1 x
RW-1
R-1*

ii. Bedrock Aquifer

MW-18

(b) Groundwater monitoring wells MW-2, MW-16, MW-18, MW-20 and MW-24 will define the point of compliance for the Polymer Pond area. MW-5, MW-6, MW-7, MW-8, MW-14, MW-28, MW-29, MW-30, MW-31, MW-32, MW-33 and MW-34 shall define the point of compliance for the Series Pond area.

see



Semi Annually



(c) The Permittee shall install and maintain groundwater monitoring wells off-site within 60 days of obtaining off-site access and as referenced in the Work Plan dated April 30, 1987 and the Progress Report dated June 30, 1987.

Off-site

MW-36	MW-39	MW-42	MW-46 ✓	MW-49 ✓
MW-37	MW-40	MW-43	MW-47 ✓	
MW-38	MW-41	MW-45	MW-48	

MW-52 ✓

Permit Number: HW-051(D)

AZS Corporation - Atlanta, Georgia

- (d) The Permittee shall install additional wells as necessary to ensure that, at all times, the current groundwater monitoring system in (a), (b), and (c) above is adequate to assess changes in the rate and extent of any plume of contamination or to assess the effectiveness of corrective action. A plan for such a modification to the existing monitoring system shall, at a minimum, specify:
 - i. Well construction techniques,
 - ii. Well development method(s),
 - iii. A complete analysis of all construction materials,
 - iv. A schedule for implementation of the wells, and
 - v. Provisions for determining the hydraulic conductivity and grain size distribution for the applicable aquifer unit(s) at the location of the new well(s).

2.

Groundwater Monitoring Program


The Permittee shall establish and implement a groundwater monitoring program to demonstrate the effectiveness of the corrective action program required under 264.95, 265.97 and 264.100 (and 264.101 as related to other releases of hazardous waste or hazardous constituents from a solid waste management unit). Groundwater monitoring shall be conducted in conformance with the requirements of 264.100(d) and as specified below:


- (a) Samples shall be collected by the techniques described in Appendix III of the permit application and as required by §264.97.
- (b) Samples shall be preserved in accordance with the procedures specified in Appendix III of the permit application.
- (c) Samples shall be tracked and controlled using the chain of custody procedures specified in Appendix III of the permit application.
- (e) The Permittee shall determine the groundwater surface elevation, each time groundwater is sampled, in accordance with Appendix III of the permit application.
- (f) The Permittee shall establish background concentrations for the parameters


Permit Number: HW-051(D)

AZS Corporation - Atlanta, Georgia

identified in Table II-1. Upon the effective date of this permit, the Permittee shall initiate quarterly sampling of the upgradient wells MW-1 and MW-23 for one year. At each quarterly sampling 4 replicate samples shall be collected from both wells and analyzed for each of the parameters identified in Table II-1. Within 15 days of receipt of the analytical results of the fourth quarterly sample the Permittee shall submit a report to the Director of EPD. This report shall include all of the individual sample results for the quarters of sampling. Also included shall be a data summary consisting of a mean value and standard deviation for each parameter. These mean values shall constitute the background values and are automatically incorporated into this permit as the applicable groundwater protection standards.

 The Permittee shall determine, quarterly, groundwater quality at each compliance point well for the parameters specified in Table II-1 throughout the compliance period as defined under Condition II.L.4.


See table Samples shall be obtained at least ~~semi-annually~~ from the wells identified in Condition II.L.1(a) and (c) and from Bellwood Branch, from at least sampling points 1, 2, 3, and 4 as described in Section VII of the permit application, and analyzed for all parameters specified in Table II-1. This program shall begin no later than 30 days following the completion of Condition II.L.1(c).

 Pursuant to 264.100(d) and 264.99(g) the Permittee shall analyze samples from one (1) cluster of wells and any additional wells selected by the Director at the compliance point for both series and polymer pond areas for all constituents in Appendix IX, or as superseded by future regulations, of at least ~~annually~~ beginning one (1) year from the effective date of the permit, to determine whether additional hazardous constituents are present in the uppermost aquifer and if so, at what concentrations. These results must be submitted within 120 days of the sampling event. If the Permittee finds Appendix IX constituents in the groundwater that are not identified in Table II-1, then the Permittee may resample within one (1) month and repeat analysis. If the second analysis confirms the presence of new hazardous constituents, then the Permittee must report the concentrations of these additional constituents to the Director within seven (7) days of the second analysis and add them to the Table II-1. If the Permittee chooses

Permit Number: HW-051(D)

AZS Corporation - Atlanta, Georgia

not to resample, then the Permittee must report those additional concentrations to the Director within seven (7) days of the initial analysis and request that these additional hazardous constituents be added to Table II-1.

- (j) When the Permittee finds any hazardous constituents in the groundwater that are not identified in the groundwater protection standard in Condition II.L.3., the Permittee shall develop background concentrations according to Condition II.L.2.f. and incorporate such values into the protection standard in Condition II.L.3.
- (k) Compliance with the groundwater protection standard, as defined under Condition II.L.3. will be based upon groundwater monitoring data obtained under Condition II.L.2.g. that indicate that all constituents listed in Table II-1 no longer significantly exceed the groundwater protection standard at the point of compliance or anywhere within an identified plume of contamination.
- (l) The statistical procedure described in §264.97(h) and (i) shall be used to determine compliance with the groundwater protection standard in Condition II.L.3.

3. Groundwater Protection Standard

- (a) The groundwater protection standard as required under §264.92, shall consist of Tables II-1 which list the hazardous constituents and their respective concentrations limits as required under §§264.93 and 264.94 respectively.
- (b) The groundwater protection standard applies to all hazardous waste or hazardous constituent releases as deemed appropriate by the Director to protect human health and the environment.

4. Compliance Period

The compliance period shall be defined as continuing until the groundwater protection standard has not been exceeded for a period of three (3) consecutive

Permit Number: HW-051(D)

AZS Corporation - Atlanta, Georgia

years and corrective action as required under §264.100 has been terminated, as specified in Condition II.P.2. and required by §264.96(c). The compliance period shall begin with the effective date of this permit.

M. Corrective Action Program for the Surface Impoundments

The Permittee shall implement the on-site corrective action program as required under §264.100 within thirty (30) days of the effective date of this permit and as presented in Section X and XI of the permit application for those hazardous constituents that exceed the groundwater protection standard in Table II-1 pursuant to the following:

1. The Permittee shall conduct a corrective action program to remove or treat in place any hazardous constituents that exceed concentration limits in Table II-1 in groundwater between the point of compliance and the downgradient facility property line as required under §264.100(e)(1) and beyond the facility boundary as required under 264.100(e)(2) unless despite the Permittee's best efforts the Permittee was unable to obtain the necessary permission to undertake such action or the Director, upon review of the results of AZS' off-site investigation, deem such action is not necessary to protect human health or the environment.
2. Within ninety (90) days of the effective date of this permit the Permittee shall submit to the Director an interim report with supporting data which details the effectiveness of the corrective action program, as well as, facility compliance with Condition II.M.5.
3. Within thirty (30) days of a determination that any hazardous constituent exceeds the concentration limits in Table II-1 in the groundwater beyond the facility property line, the Permittee shall submit to the Director a corrective action plan to remove or treat in place such contamination.
4. The permittee shall ensure that the corrective action program will function as designed and planned in Sections X and XI of the permit application and in accordance with any subsequent revisions, modifications or changes to the original plan. Any measures taken to satisfy this Condition shall be reported in the semi-annual report required by Condition II.O.2. ~~Indicators of an ineffective corrective action program shall include:~~ but not be limited to the following occurrences, requiring a permit modification as described by Condition II.P.:

Permit Number: HW-051(D)

AZS Corporation - Atlanta, Georgia

- (a) Monitoring wells described in Condition II.L.1. and any well installed after the effective date of this permit, show a significant increase in a hazardous constituent attributable to the waste management practices over three (3) consecutive sampling periods.
 - (b) Monitoring wells described in Condition II.L.1. and all monitoring wells installed to comply with any condition of this permit do not indicate that the corrective action program is performing as expected.
- 5. The Permittee shall treat, store, and dispose of all contaminated groundwater in accordance with all applicable federal, state and local laws. All vapors produced by treating contaminated groundwater via air stripping shall be vented so to ensure adsorption by activated charcoal.
 - 6. If the groundwater protection standards are met during the compliance period, the Permittee must continue corrective action to the extent necessary to ensure that the groundwater protection standard is not exceeded. Corrective action must continue until the groundwater protection standard has not been exceeded for three (3) consecutive years as required under §264.100(f).

N. Sampling and Analysis Procedures

The Permittee shall use the following techniques and procedures when obtaining and analyzing samples from the groundwater monitoring wells described in Condition II.L.1.(a), (b) and (c) to provide a reliable indication of the quality of the groundwater as required under §264.97(d) and (e):

- 1. Samples shall be collected, preserved, and shipped (when shipped off-site for analysis) in accordance with the procedures specified in Appendix III of the permit application, and all modifications or amendments subsequent to the date of the permit application.
- 2. Samples shall be analyzed according to the procedures specified in Section E of the permit application or in the current EPA Manual SW-846 using whichever procedure is more recent at the time of analysis.
- 3. Samples shall be tracked and controlled using the chain of custody procedures specified in Appendix III of the permit application.

Permit Number: HW-051(D)

AZS Corporation - Atlanta, Georgia

O. Reporting, Recordkeeping, and Response

1. The Permittee shall enter all monitoring, testing, and analytical data obtained pursuant to Condition II.L. and Section III of this permit in the operating record, as required by §264.73(b)(6).
2. The Permittee shall submit a report to the Director on the effectiveness of the corrective action program semi-annually as required by §264.100(g) to include all monitoring, testing and analytical data obtained under Condition II.L., II.M. and III.R.

P. Permit Modification

1. If the Permittee at any time determines that the corrective action program no longer satisfies the requirements of 40 CFR 264.100 or Condition II.M. for releases of hazardous constituents that originate from the Surface Impoundments, he must within 90 days submit an application for a permit modification to make any appropriate changes in the program.
2. If the Permittee meets or exceeds the requirements of §264.100 and meets the groundwater protection standard at the point of compliance for three (3) consecutive years, the Permittee may submit an application for a permit modification pursuant to §270.42 to terminate corrective action and establish an alternate groundwater monitoring program.

Q. Duty of Permittee

The Permittee shall assure that groundwater monitoring and corrective action measures necessary to achieve compliance with §264.100 and the groundwater protection standard are taken during the compliance period.

SECTION III. CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS AND OTHER RELEASES

For the purposes of this permit, the need to conduct corrective action shall be determined for any releases into the environment of hazardous waste or constituents, including releases beyond the Permittee's property boundary. Corrective action applies to any releases of hazardous waste or hazardous constituents regardless of whether or not the

Permit Number: HW-051(D)

AZS Corporation - Atlanta, Georgia

releases were from solid waste management unit.

R. RCRA Facility Assessment (RFA) Report

1. The condition of this Section apply to all known the solid waste management units and any additional solid waste management units discovered during the course of future groundwater monitoring, on-going field investigations, environmental audits, and other means, for which no previous investigation has been conducted.
2. The Permittee shall prepare a solid waste management unit assessment plan and proposed schedule for implementation and completion for any solid waste management unit discovered subsequent to issuance of this permit which is known or suspected to have releases of hazardous waste, hazardous constituents, or hazardous waste constituents. The assessment plan shall be submitted within sixty (60) days of discovery of a new solid waste management unit.

The plan shall include methods and specific actions as necessary to determine whether a prior or continuing release of hazardous waste, hazardous constituents or hazardous waste constituents has occurred at each solid waste management unit. The plan must also include, at a minimum, the following information for each unit:

- (a) Type of unit
- (b) Location of each unit on a topographic map of appropriate scale
- (c) General dimensions and capacities
- (d) Function of unit
- (e) Dates that the unit was operated
- (f) Description of the wastes that were placed in the unit
- (g) Description of any known releases or spills (to include groundwater data, soil analyses, and or surface water data)

The assessment plan shall be submitted within ninety (90) days of issuance of this permit, if not previously submitted.

S. Remedial Investigation Plan

1. The Permittee shall prepare a solid waste management unit remedial investigation

Permit Number: HW-051(D)

AZS Corporation - Atlanta, Georgia

plan for all those units listed in Condition III.R.1. for which one has not been completed, which includes schedules of implementation and completion of specific actions necessary to determine the nature and extent of releases indicated by the assessment plan, and the potential pathways of contaminant releases to the air, land, surface water and groundwater. The Permittee must provide documentation that a release is not probable if a unit identified in the assessment plan is not included in the remedial investigation plan.

2. For those units identified under Condition III.R.2., the Permittee shall prepare a solid waste management unit remedial investigation plan which includes schedules of implementation and completion of specific action necessary to determine the nature and extent of releases indicated by the assessment plan, and the potential pathways of contaminant releases to the air, land, surface water, and groundwater, within ninety (90) days of submittal of the plan specified under Condition III.R.2. The Permittee must provide documentation that a release is not probable if a unit identified in the assessment plan is not included in the remedial investigation plan.

T. Corrective Action Plan

1. The Permittee shall continue corrective action for groundwater contamination in connection with the surface impoundments as specified in Condition II.M.1. and 2. of this permit.
2. The Director shall review the final reports on the remedial investigations conducted under Condition III.S. and notify the Permittee of the need for further investigative actions and/or the need for corrective action as required under §264.101(a).
3. Upon determination that corrective action is needed, the Permittee shall submit a corrective action plan in accordance with a schedule to be determined by the Director. The proposed corrective action plan must include a description of the corrective measures to be taken at each unit, a schedule of implementation and completion, and a cost estimate for completion of corrective action.
4. If the Permittee at any time determines that the solid waste management unit remedial investigation or corrective action plans required under Conditions III.R., III.S. and III.T. no longer satisfy the requirements of §264.101 or this permit for prior or continuing releases of hazardous waste, hazardous waste constituents or

Permit Number: HW-051(D)

AZS Corporation - Atlanta, Georgia

hazardous constituents from solid waste management units, he must submit an amended plan(s) to the Director within ninety (90) days of such determination.

U. Schedule of Compliance

1. The Permittee shall submit the items required by Condition III.S.1. and the associated documentation to the Director within ninety (90) days of the effective date of this permit.
2. The Permittee shall submit a remedial investigation plan as required by Condition III.S.2. and the associated documentation to the Director within ninety (90) days of submittal of items required by Condition III.R.2.
3. All plans and schedules shall be subject to approval by the Director prior to implementation. The Permittee shall revise all submittals as specified by the Director.
4. If the time required to complete any interim activity is more than one year, the schedule shall specify interim dates for the submission of reports of progress toward satisfaction of the interim requirements.
5. The results of all plans and reports shall be submitted in accordance with the approved schedule. Extensions of the due date for submittals may be granted by the Director based on the Permittee's demonstration that sufficient justification for the extension exists.

V. Permit Modification

If required to develop a corrective action plan under III.T., the Permittee shall apply for a permit modification pursuant to §270.42 to incorporate the plan into the permit.

Permit Number: HW-051(D)

AZS Corporation - Atlanta, Georgia

Table II-1

Groundwater Protection Standard

Hazardous Constituents		Concentration Limits (mg/L)
Barium	(total)	1.00**
Cadmium	(total)	0.01**
Chromium	(total)	0.05**
Lead	(total)	0.05**
Acetone		Background*
Benzene		Background
Carbon disulfide		Background
Chloroform		Background
Cresol (Series Pond Area Only)		Background
Cyanide		Background
1,1-Dichloroethane		Background
1,1-Dichloroethylene		Background
1,4-Dioxane		Background
Ethyl benzene		Background
Formaldehyde		Background
Methyl ethyl ketone		Background
Methyl isobutyl ketone		Background
Methyl n-butyl ketone		Background
Methylene Chloride		Background
Nickel		Background
Tetrachloroethylene		Background
Toluene		Background
1,1,1-Trichloroethane		Background
Trichloroethylene		Background
Vinyl chloride		Background
Xylene (total)		Background

* Background concentration limits shall be calculated according to the procedure described in §264.99(c).

** Concentration Limit derived from Table 1 of 40 CFR 264.94.

(Cis) 1,2-dichloroethane

Vandium

Zinc

Any other constituents in Appendix TX

AZS Facility
Atlanta, Fulton County

LAT 33° 46' 58"N / LONG 84° 22' 08"W

RAD	Population		Households		Households Domestic Well		Households Public Water		Population Domestic Well		Population Public Water	
	Ring	Total	Ring	Total	Ring	Total	Ring	Total	Ring	Total	Ring	Total
0.25	663	663	175	175	0	0	175	175	0	0	663	663
0.50	2225	2888	523	698	0	0	523	698	0	0	2225	2888
1.00	8622	11510	2801	3499	0	0	2801	3499	0	0	8622	11510
2.00	35029	46539	12799	16297	14	14	12784	16283	32	32	34997	46507
3.00	58875	105414	23941	40239	5	19	23937	40220	9	42	58866	105373
4.00	74036	179451	31959	72197	11	30	31947	72167	27	69	74009	179382

Source: Census of Population and Housing, 1990: Summary Tape File 3 on CD-ROM Georgia
[machine-readable data files] / prepared by the Bureau of the Census. -Washington: The
Bureau [producer and distributor], 1992.

Ref. a4

AZS Facility
Atlanta, Fulton County

LAT 33° 46' 58"N / LONG 84° 22' 08"W

Population

Households

Rad	Ring	Total	Ring	Total
0.25	1315	1315	47	47
0.50	2895	4211	538	585
1.00	8023	12234	2992	3578
2.00	31451	43685	11054	14631
3.00	64520	108204	29292	43923
4.00	78329	186533	34224	78147

Source: Census of Population and Housing, 2000: Summary Tape File 3 on CD-ROM Georgia [machine-readable data files] / prepared by the Bureau of the Census. -Washington: The Bureau [producer and distributor], 2002.



Upper number = Population per 2000 census tract
Lower number = # households per 2000 census tract

NOTE: Tract containing a population of 2679 contains a jail.



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AZS CHEMICAL CO

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<u>OU</u>	<u>Action Name</u>	<u>Qualifier</u>	<u>Lead</u>	<u>Actual Start</u>	<u>Actual Completion</u>
00	DISCOVERY		F		07/01/1980
00	PRELIMINARY ASSESSMENT	N	S		09/17/1985
00	ARCHIVE SITE		EP		12/19/1996

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This site has been archived from the inventory of active sites.

Site Name: AZS CHEMICAL CO

Street: 762 MARIETTA BLVD NW

City / State / ZIP: ATLANTA, GA 30318

NPL Status: Not on the NPL

Non-NPL Status: NFRAP

EPA ID: GAD057288144

EPA Region: 04

County: FULTON

Federal Facility Flag: Not a Federal Facility

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RCRA Site Detail

Report run on: November 16, 2007 - 10:30 AM

Version 3.0

User Selection Criteria

Handler EPA ID: GAD981237225

Activity Location: GEORGIA

History: All records

WAR Cycles: Show all

Results

Data meeting the criteria you selected follows.

Total Pages: 5

Report Description

The RCRA Site Detail report provides "all available details" from the handler module and summarized information from the waste activity monitoring module for one RCRA site. The report integrates National Biennial RCRA Hazardous Waste Report data with Site Identification data.

Details reported about the RCRA site include basic handler module information; the standard suite of universes; information about each source record received for the facility, including basic information, location and mailing address, source record and permit contact person (including historical records), list of NAICS codes, complete list of regulated waste activities; and summarized National Biennial RCRA Hazardous Waste Report information by reporting cycle year, including quantity totals (generated, managed, shipped, received), and top ten GM forms by quantity generated. Top ten GM form list shows reported waste description, quantities, onsite and offsite system types, and EPA and State waste codes.

Information listed for the RCRA site can be limited by activity location, latest historical information, and most recent BR cycle.

Data is sorted by Activity Location, most recent Received Date, and highest sequence number, with the exception that the activity location matching the site's location state is sorted to the top.

Report Information

Name: sitedetail.rdf
Developed by: EPA Headquarters, Office of Solid Waste
Deployed: November 2002
Last Revised: June 2007
Contact: rcrainfo.help@epa.gov
Tables Used: hbasic, hreport_univ3, hprevious_id, hhandler2, lu_country, howner_operator2, hnaics, lu_naics, hstate_activity, hother_permit2, huniversal_waste, lu_universal_waste, hwaste_code, bgm_basic, bgm_onsite_treatment, bgm_offsite_shipment, bwr_basic, bwr_waste_code, lu_management_method, gpra_ca, aevent, aln_area_event, aarea, lu_state, hid_groups
Libraries: decodes.pll

NOTE: Some data is suppressed if it is null or blank. See documentation in RCRAInfo Help for details.

RCRA Site Detail

Report run on: November 16, 2007 - 10:30 AM

Page 2

List of Hazardous Waste Code Descriptions

Please run the lookup table report for LU_WASTE_CODES for description of federal and state waste codes in this report.

List of Handler Universe Abbreviations

Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
EI Indicator (HE/GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)

RCRA Site Detail

Report run on: November 16, 2007 - 10:30 AM

Page 3

GAD981237225 AZS CORPORATION

EPA Region 04 Extract Flag: Y Facility Identifier: County: FULTON

Universes Generator: SQG Transporter: N Active: Y
Operating TSDF: ---- IC In Place: N EI Indicator (HE / GW): + / +

Activity Location: GA Source Type: Notification Seq. Number: 1 Receive Date: 14 AUG 2000

Other/Previous Site Name: AZS CORPORATION

Location 762 MARIETTA BLVD Address: ATLANTA, GA 30318	Mailing PO BOX 3020 Address: COVINGTON, GA 30015 UNITED STATES
--	--

Contact Person ROY MOTE
For Source (770) 786-2338
Information PO BOX 3020
COVINGTON, GA 30015
UNITED STATES

Owner (current) 1100 CIRCLE 75 SUITE 600 Type: Private
AZS CORPORATION ATLANTA, GA 30339
From: To: Phone: (770) 618-1465

Land Type: Indian Non Notifier: No Commercial Availability: Other - U Tsd Date:
Accessibility: No. Employees: State District: TJB

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Small Quantity Generator; State: GA-F FEDERALLY DEFINED GENERATOR

Transfer Facility:

Other Hazardous Waste Generator Activities

Importer Activity: Unknown
Mixed Waste Generator: Unknown
Transporter Activity: No
TSDF Activity: No
Recycler Activity: No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown
Smelting, melting, Refining Furnace
Exemption: Unknown

Used Oil Activities

Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Transporter: No	Used Oil Fuel Marketer Activity	
Transfer Facility: No	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Used Oil Processor and/or Re-refiner Activity	Marketer who first claims the used oil meets the specifications:	No
Processor: No		
Refiner: No		
Underground Injection Control: No	Destination Facility for Universal Waste:	No

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D040, F002

Activity Location: GA Source Type: Biennial Report Seq. Number: 1 Receive Date: 23 MAR 1994 Report Cycle: 1993

Other/Previous Site Name: AZS CORPORATION

Location 762 MARIETTA BLVD NW Address: ATLANTA, GA 30318	Mailing AZS CORP C/O HAZWASTE INC Address: 2264 NORTHWEST PKWY SUITE F MARIETTA, GA 30067
---	---

Contact Person TUSHAR E TALELE
For Source (404) 988-8184
Information

Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date:
Accessibility: No. Employees: State District:

NAICS Codes: 32511 Petrochemical Manufacturing

Notes: THE WASTES ARE GENERATED FROM GROUNDWATER REMEDIATION ACTIVITIES.

RCRA Site Detail

Report run on: November 16, 2007 - 10:30 AM

Page 4

GAD981237225 AZS CORPORATION

Continued...

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility: Unknown

Other Hazardous Waste Generator Activities

Importer Activity: Unknown
Mixed Waste Generator: Unknown

Transporter Activity: Unknown
TSD Activity: Yes
Recycler Activity: Unknown

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown
Smelting, melting, Refining Furnace Exemption: Unknown

Used Oil Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: Unknown

Transporter: Unknown
Transfer Facility: Unknown

Used Oil Fuel Marketer Activity
Marketer who directs shipment off-specification used oil to off-specification used oil burner: Unknown

Used Oil Processor and/or Re-refiner Activity

Processor: Unknown
Refiner: Unknown

Marketer who first claims the used oil meets the specifications: Unknown

Underground Injection Control: Unknown
Destination Facility for Universal Waste: Unknown

Biennial Report Information

Total Quantity Reported (Tons): Generated: 7 Managed: 6,227 Shipped: 7 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
1	0	SPENT CARBON FROM CARBON POLISHING PROCESS IN ON-SITE GROUNDWATER TREATMENT SYSTEM	1	H132 - LANDFILL OR SURFACE IMPOUNDMENT
EPA Waste Codes: F002, F003, F005				
0	6,227	TREATED GROUNDWATER FROM ON-SITE GROUNDWATER EXTRACTION WELLS; NO HAZARDOUS CONSTITUENTS.	0	
EPA Waste Codes: F002, F003, F005				

Activity Location: GA Source Type: Implementer Seq Number: 1

Receive Date: 17 FEB 1992

Other/Previous Site Name: AZS CORPORATION

Location: 762 MARIETTA BLVD
Address: ATLANTA, GA 30318

Mailing Address: PO BOX 3020
COVINGTON, GA 30015

Land Type: Indian

Non Notifier: No

Commercial Availability: Other - U

Tsd Date:

Accessibility:

No. Employees:

State District: NRW

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State: HQ-N Not a Generator

Transfer Facility: Unknown

Other Hazardous Waste Generator Activities

Importer Activity: Unknown
Mixed Waste Generator: Unknown

Transporter Activity: No
TSD Activity: Yes
Recycler Activity: No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown
Smelting, melting, Refining Furnace Exemption: Unknown

Used Oil Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: No

Transporter: No
Transfer Facility: No

Used Oil Fuel Marketer Activity
Marketer who directs shipment off-specification used oil to off-specification used oil burner: No

Used Oil Processor and/or Re-refiner Activity

Processor: No
Refiner: No

Marketer who first claims the used oil meets the specifications: No

Underground Injection Control: No
Destination Facility for Universal Waste:

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: NONE

Activity Location: GA Source Type: Part A

Seq. Number: 1

Receive Date: 19 NOV 1980

Other/Previous Site Name: AZS CORPORATION

RCRA Site Detail

Report run on: November 16, 2007 - 10:30 AM

Page 5

GAD981237225 AZS CORPORATION

Continued...

Location 762 MARIETTA BLVD
Address: ATLANTA, GA 30318

Mailing PO BOX 3020
Address: COVINGTON, GA 30015

Contact Person JOEL PADGETT 6201 POWERS FERRY RD
For Source (404) 859-0536 ATLANTA, GA 30339
Information

Operator (current) 762 MARIETTA BLVD
AZS CORPORATION ATLANTA, GA 30318
From: **To:** **Type:** Private
Phone: (404) 873-1851

Land Type: Indian **Non Notifier:** No **Commercial Availability:** Other - U **Tsd Date:**
Accessibility: **No. Employees:** **State District:** NRW

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State: HQ-N Not a Generator

Transfer Facility: Unknown

Used Oil Activities

Other Hazardous Waste Generator Activities

Used Oil Transporter Activity **Off-Specification Used Oil Burner:** No

Importer Activity: Unknown
Mixed Waste Generator: Unknown

Transporter: No
Transfer Facility: No

Used Oil Fuel Marketer Activity

Transporter Activity: No
TSD Activity: Yes
Recycler Activity: No

**Used Oil Processor and/or
Re-refiner Activity**

**Marketer who directs shipment
off-specification used oil to
off-specification used oil burner:** No

Processor: No
Refiner: No

**Marketer who first claims the used
oil meets the specifications:** No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown
**Smelting, melting, Refining Furnace
Exemption:** Unknown

**Underground
Injection Control:** No

**Destination Facility for
Universal Waste:**

Other Permits:

Number	Description	Owner	Type	Type Description
GA0000361		US	N	NPDES

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: U154, U159, U194

*** End of Report ***

Comprehensive Compliance Monitoring and Enforcement Report

Report run on: November 16, 2007 - 10:31 AM

Version: 3.0

User Selection Criteria

Location:	Georgia, all activities	Activity Location:	None Chosen
Handler ID:	GAD981237225	Group of IDs:	None Chosen
Handler Name:			
Handler Universe:	No Additional Restrictions		
Evaluation Date Range:	From Date: 10/01/1990 To Date: 11/16/2007	Extract Flag:	Include All Sites
Location County Code:		Evaluation Suborganization:	
Location City:		Evaluation Person:	
Location Zip Code:		Evaluation Focus Area:	
State District:		Federal Facilities:	No, Show All
		Only Eval's with Viol's:	No, All Evaluations
Evaluating Agencies:	None Chosen		
Evaluation Types:	None Chosen		
Violation Types:	None Chosen		
Sort Order:	Region, State, Handler Name		
Display Code Descrip.:	Yes		

Results

Data meeting the criteria you selected follows.

Total Pages: 18

Handler Count: 1

Report Description

This report provides a complete listing of evaluation, violation and enforcement activities for each Handler, including all orphan records. Below the Handler ID information, the data is presented in three sections; evaluations, violations and enforcements. Comments, referred to as Notes, are provided in each respective section. Since evaluations are included regardless of whether or not violations are identified, this report also serves as a useful management tool for tracking progress made towards meeting RECAP commitments.

Report Information

Name: cmecomp.rdf
Developed by: EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed Date: November 2005
Last Updated: April 2006
Contact: rcrainfo.help@epa.gov
Tables Used: cmecomp3, hreport_univ3, ccitation3, hhandler2, lu_state, hid_groups
Libraries: none

Comprehensive Compliance Monitoring and Enforcement Report

Page 2

Report run on: November 16, 2007 - 10:31 AM

This report may contain enforcement sensitive data.

AZS CORPORATION

County Name / Code: FULTON / GA121

GAD981237225

REGION 04

Location: 762 MARIETTA BLVD; ATLANTA, GA 30318

Mailing: PO BOX 3020; COVINGTON, GA 30015

Activity Location: GA	State District: TJB	Accessibility:	Non-Notifier:	Extract Flag: Y	Active Site: Y
Generator: SQG	Transporter: N	Operating TSDF: ----	IC In Place: N	El Indicator (HE / GW): + / +	
Full Enforcement: L----	Converter: ----	State Unaddressed SNC: N	EPA Unaddressed SNC: N		
CA Wrkld: Y	State TSDF: ----	State Addressed SNC: N	EPA Addressed SNC: N		
Active State Gen: N		State SNC w/Comp Sched: N	EPA SNC w/Comp Sched: N		

OAM Evaluation 09/24/2007	Activity Location: GA	By: STATE	Identifier: 001	Person: GAPMG	Suborganization: LD	Found Violation: U
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 09/24/2007	Focus Area:	

No Linked Violations

CAC Evaluation 09/24/2007	Activity Location: GA	By: STATE	Identifier: 002	Person: GAPMG	Suborganization: LD	Found Violation: U
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 09/24/2007	Focus Area:	

No Linked Violations

CEI Evaluation 09/24/2007	Activity Location: GA	By: STATE	Identifier: 003	Person: GATJB	Suborganization: LD	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 09/24/2007	Focus Area:	

No Linked Violations

FRR Evaluation 02/17/2006	Activity Location: GA	By: EPA CONTRACTOR	Identifier: 001	Person: PMALK	Suborganization:	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area:	

Eval. Notes: - Former Eval Owner and Type: HQ FRR. Former Reason Owner and Code:

No Linked Violations

OAM Evaluation 06/20/2002	Activity Location: GA	By: STATE	Identifier: 001	Person: GAMC	Suborganization: LD	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area:	

Eval. Notes: COMMENT LTR SENT 7/18/02 - Former Eval Owner and Type: HQ OAM. Former Reason Owner and Code:

No Linked Violations

CEI Evaluation 05/02/2001	Activity Location: GA	By: STATE	Identifier: 001	Person: GANRW	Suborganization: LD	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area:	

Eval. Notes: - Former Eval Owner and Type: HQ CEI. Former Reason Owner and Code: GA 66

No Linked Violations

FRR Evaluation 12/21/2000	Activity Location: GA	By: STATE	Identifier: 001	Person: GANRW	Suborganization: LD	Found Violation: YES
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area:	

Eval. Notes: REVIEW OF TRUST AGREEMENT DOC FOR POST CLOSURE CARE - Former Eval Owner and Type: HQ FRR. Former Reason Owner and Code:

Comprehensive Compliance Monitoring and Enforcement Report

Page 3

Report run on: November 16, 2007 - 10:31 AM

This report may contain enforcement sensitive data.

AZS CORPORATION, GAD981237225, ATLANTA, GA, continued -

Violation: Activity Location: GA Type: 264.H Determined Date: 12/21/2000 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: Actual Compliance Date: 01/10/2001 RTC Qualifier: DOCUMENTED Sequence Number: 38
Former Citation - SR - 264.145
Viol. Notes: FAILURE TO PROVIDE FINANCIAL ASSURANCE FOR PC CARE
Enforcement: Activity Location: GA Type: 120 Action Date: 12/28/2000 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:
Enf. Notes:

NRR Evaluation 10/26/2000 Activity Location: GA By: STATE Identifier: 001 Person: GASJB Suborganization: LD Found Violation: NO
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: REVIEWED 7/2000 RPT TITLED "REMEDATION EFFECTIVENESS" - Former Eval Owner and Type: HQ NRR. Former Reason Owner and Code: GA 20

No Linked Violations

NRR Evaluation 10/23/2000 Activity Location: GA By: STATE Identifier: 001 Person: GASJB Suborganization: LD Found Violation: NO
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: REVIEWED 4/2000 RPT TITLED "1999 ANNUAL RPT FOR POST-CLOSURE CARE & CORRECTIVE ACTION OF HW SURFACE IMPOUNDMENTS FOR 12/15-16/1999" - Former Eval Owner and Type: HQ NRR. Former Reason Owner and Code: GA 20

No Linked Violations

SNN Evaluation 09/28/2000 Activity Location: GA By: STATE Identifier: 001 Person: GANRW Suborganization: LD Found Violation: NO
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: - Former Eval Owner and Type: HQ SNN. Former Reason Owner and Code:

No Linked Violations

OAM Evaluation 02/23/2000 Activity Location: GA By: STATE Identifier: 001 Person: GASJB Suborganization: LD Found Violation: NO
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: - Former Eval Owner and Type: HQ OAM. Former Reason Owner and Code:

No Linked Violations

CAC Evaluation 02/23/2000 Activity Location: GA By: STATE Identifier: 002 Person: GASJB Suborganization: LD Found Violation: NO
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: - Former Eval Owner and Type: HQ CAO. Former Reason Owner and Code:

No Linked Violations

CEI Evaluation 02/23/2000 Activity Location: GA By: STATE Identifier: 003 Person: GANRW Suborganization: LD Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: - Former Eval Owner and Type: HQ CEI. Former Reason Owner and Code:

Comprehensive Compliance Monitoring and Enforcement Report

Page 4

Report run on: November 16, 2007 - 10:31 AM

This report may contain enforcement sensitive data.

AZS CORPORATION, GAD981237225, ATLANTA, GA, continued -

Violation: Activity Location: GA Type: 262.A Determined Date: 02/23/2000 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: Actual Compliance Date: 09/28/2000 RTC Qualifier: DOCUMENTED Sequence Number: 36

Former Citation - SR - 264.145

Viol. Notes: FAILURE TO PROVIDE FINANCIAL ASSURANCE FOR PC CARE

Enforcement: Activity Location: GA Type: 310 Action Date: 09/28/2000 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD

Penalty Information: Penalty Information Printed Above

CA Component: N

Disposition Status:

Appeal Initiated:

Appeal Resolved:

Enf. Notes:

Violation: Activity Location: GA Type: 262.A Determined Date: 02/23/2000 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: Actual Compliance Date: 07/20/2000 RTC Qualifier: DOCUMENTED Sequence Number: 37

Former Citation - SR - 264.100(g)

Viol. Notes: FAILURE TO SUBMIT SEMI ANNUAL EFFECT REPORT

Enforcement: Activity Location: GA Type: 310 Action Date: 09/28/2000 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD

Penalty Information: Proposed: Final Monetary: \$50,000 Collected: \$50,000 Total Final: \$50,000

CA Component: N

Disposition Status:

Appeal Initiated:

Appeal Resolved:

Enf. Notes:

NRR Evaluation 07/28/1999 Activity Location: GA By: STATE Identifier: 001 Person: GASJB Suborganization: LD Found Violation: NO
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: REVIEWED 7/20/99 LTR FROM CHUCK HILL RE MONITORING PROGRAM & WELL INSTALLATION - Former Eval Owner and Type: HQ NRR. Former Reason Owner and Code: GA 20

No Linked Violations

CEI Evaluation 03/19/1999 Activity Location: GA By: STATE Identifier: 001 Person: GANRW Suborganization: LD Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: - Former Eval Owner and Type: HQ CEI. Former Reason Owner and Code:

Violation: Activity Location: GA Type: 264.H Determined Date: 03/19/1999 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: Actual Compliance Date: 09/28/2000 RTC Qualifier: DOCUMENTED Sequence Number: 26

Former Citation - SR - permit cond ii.m.5

Viol. Notes: FAILURE TO PROPERLY VENT AIR EMISSIONS FROM THE AIR STRIPPER

Enforcement: Activity Location: GA Type: 310 Action Date: 09/28/2000 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD

Penalty Information: Proposed: Final Monetary: \$50,000 Collected: \$50,000 Total Final: \$50,000

CA Component: N

Disposition Status:

Appeal Initiated:

Appeal Resolved:

Enf. Notes:

Enforcement: Activity Location: GA Type: 120 Action Date: 05/18/1999 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD

CA Component: N

Disposition Status:

Appeal Initiated:

Appeal Resolved:

Enf. Notes: NOV WRITTEN BY NORMAN WOODBURN FOR MY INSPECTION

Comprehensive Compliance Monitoring and Enforcement Report

Page 5

Report run on: November 16, 2007 - 10:31 AM

This report may contain enforcement sensitive data.

AZS CORPORATION, GAD981237225, ATLANTA, GA, continued -

Violation: Activity Location: GA Type: 264.H Determined Date: 03/19/1999 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: Actual Compliance Date: 09/28/2000 RTC Qualifier: DOCUMENTED Sequence Number: 27
Former Citation - SR - 264.145
Viol. Notes: FAILURE TO PROVIDE FINANCIAL ASSURANCE FOR POST CLOSURE CARE

Enforcement: Activity Location: GA Type: 310 Action Date: 09/28/2000 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD

Penalty Information: Penalty Information Printed Above

CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enf. Notes:

Enforcement: Activity Location: GA Type: 120 Action Date: 05/18/1999 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enf. Notes: NOV WRITTEN BY NORMAN WOODBURN FOR MY INSPECTION

Violation: Activity Location: GA Type: 264.B Determined Date: 03/19/1999 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: Actual Compliance Date: 07/20/2000 RTC Qualifier: DOCUMENTED Sequence Number: 28
Former Citation - SR - 264.100(g)
Viol. Notes: FAILURE TO SUBMIT SEMI-ANNUAL EFFECTIVENESS REPORT

Enforcement: Activity Location: GA Type: 310 Action Date: 09/28/2000 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD

Penalty Information: Penalty Information Printed Above

CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enf. Notes:

Enforcement: Activity Location: GA Type: 120 Action Date: 05/18/1999 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enf. Notes: NOV WRITTEN BY NORMAN WOODBURN FOR MY INSPECTION

Violation: Activity Location: GA Type: 264.G Determined Date: 03/19/1999 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: Actual Compliance Date: 09/28/2000 RTC Qualifier: DOCUMENTED Sequence Number: 29
Former Citation - SR - 264.100(e)/pmt cnd ii.m
Viol. Notes: FAILURE TO OPERATE CORRECTIVE ACTION SYS

Enforcement: Activity Location: GA Type: 310 Action Date: 09/28/2000 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD

Penalty Information: Penalty Information Printed Above

CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enf. Notes:

Enforcement: Activity Location: GA Type: 120 Action Date: 05/18/1999 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enf. Notes: NOV WRITTEN BY NORMAN WOODBURN FOR MY INSPECTION

Comprehensive Compliance Monitoring and Enforcement Report

Page 6

Report run on: November 16, 2007 - 10:31 AM

This report may contain enforcement sensitive data.

AZS CORPORATION, GAD981237225, ATLANTA, GA, continued -

Violation: Activity Location: GA Type: 264.B Determined Date: 03/19/1999 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: Actual Compliance Date: 09/28/2000 RTC Qualifier: DOCUMENTED Sequence Number: 30

Former Citation - SR - ga rules 391-3-11.11
Viol. Notes: FAILURE TO OBTAIN A HW FACILITY PERMIT

Enforcement: Activity Location: GA Type: 310 Action Date: 09/28/2000 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD

Penalty Information: Penalty Information Printed Above

CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enf. Notes:

Enforcement: Activity Location: GA Type: 120 Action Date: 05/18/1999 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enf. Notes: NOV WRITTEN BY NORMAN WOODBURN FOR MY INSPECTION

Violation: Activity Location: GA Type: 264.B Determined Date: 03/19/1999 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: Actual Compliance Date: 09/28/2000 RTC Qualifier: DOCUMENTED Sequence Number: 31

Former Citation - SR - 264.73 permit cond i.b.3
Viol. Notes: FAILURE TO MAINTAIN THE OPERATING RECORD

Enforcement: Activity Location: GA Type: 310 Action Date: 09/28/2000 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD

Penalty Information: Penalty Information Printed Above

CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enf. Notes:

Enforcement: Activity Location: GA Type: 120 Action Date: 05/18/1999 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enf. Notes: NOV WRITTEN BY NORMAN WOODBURN FOR MY INSPECTION

OAM Evaluation: 03/19/1999 Activity Location: GA By: STATE Identifier: 002 Person: GASJB Suborganization: LD Found Violation: NO
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: - Former Eval Owner and Type: HQ OAM. Former Reason Owner and Code:

No Linked Violations

CAC Evaluation: 03/19/1999 Activity Location: GA By: STATE Identifier: 003 Person: GASJB Suborganization: LD Found Violation: NO
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: - Former Eval Owner and Type: HQ CAO. Former Reason Owner and Code:

No Linked Violations

NRR Evaluation: 03/18/1999 Activity Location: GA By: STATE Identifier: 001 Person: GASJB Suborganization: LD Found Violation: NO
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: REVIEWED DRAFT PERMIT APPLICATION DATED 2/23/99 NO VIOLATIONS FOUND - Former Eval Owner and Type: HQ NRR. Former Reason Owner and Code: GA 20

No Linked Violations

Comprehensive Compliance Monitoring and Enforcement Report

Page 7

Report run on: November 16, 2007 - 10:31 AM

This report may contain enforcement sensitive data.

AZS CORPORATION, GAD981237225, ATLANTA, GA, continued -

NRR Evaluation: 01/15/1999 Activity Location: GA By: STATE Identifier: 001 Person: GASJB Suborganization: LD Found Violation: NO
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: REVIEWED THE OFFSITE MONITORING WELL SAMPLING EVENT REPORT DATED 12/18/98. MADE MARGIN COMMENTS NO VIOLATIONS FOUND - Former Eval Owner and Type: HQ NRR. Former Reason Owner and Code: GA 20

No Linked Violations

CAG Evaluation: 09/24/1998 Activity Location: GA By: STATE Identifier: 001 Person: GASJB Suborganization: LD Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: - Former Eval Owner and Type: HQ CAO. Former Reason Owner and Code:

Violation: Activity Location: GA Type: 264.H Determined Date: 12/09/1996 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: 09/28/1998 Actual Compliance Date: 09/28/2000 RTC Qualifier: DOCUMENTED Sequence Number: 21
Former Citation - SR - PERMIT CONDITION II.M
Viol. Notes: FAILURE TO OPERATE THE CORRECTIVE ACTION SYSTEM

Enforcement: Activity Location: GA Type: 310 Action Date: 09/28/2000 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD
Penalty Information: Proposed: Final Monetary: \$50,000 Collected: \$50,000 Total Final: \$50,000
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enf. Notes:

Enforcement: Activity Location: GA Type: 120 Action Date: 01/02/1997 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD
Penalty Information: Penalty Information Printed Above
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Violation: Activity Location: GA Type: 264.H Determined Date: 12/09/1996 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: 09/28/1998 Actual Compliance Date: 09/28/2000 RTC Qualifier: DOCUMENTED Sequence Number: 22
Former Citation - SR - PERMIT CONDITION I.F.3
Viol. Notes: FAILURE TO PROVIDE FINANCIAL ASSURANCE FOR POST CLOSURE CARE AND CA

Enforcement: Activity Location: GA Type: 310 Action Date: 09/28/2000 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD
Penalty Information: Penalty Information Printed Above
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enf. Notes:

Enforcement: Activity Location: GA Type: 120 Action Date: 01/02/1997 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD
Penalty Information: Penalty Information Printed Above
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Comprehensive Compliance Monitoring and Enforcement Report

Page 8

Report run on: November 16, 2007 - 10:31 AM

This report may contain enforcement sensitive data.

AZS CORPORATION, GAD981237225, ATLANTA, GA, continued -

Violation: Activity Location: GA Type: 265.F Determined Date: 12/09/1996 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: 09/28/1998 Actual Compliance Date: 09/28/2000 RTC Qualifier: DOCUMENTED Sequence Number: 23

Former Citation - SR - PERMIT CONDITION II.O.2

Viol. Notes: FAILURE TO SUBMIT SEMI ANNUAL EFFECTIVENESS REPORT

Enforcement: Activity Location: GA Type: 310 Action Date: 09/28/2000 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD

Penalty Information: Penalty Information Printed Above

CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enf. Notes:

Enforcement: Activity Location: GA Type: 120 Action Date: 01/02/1997 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD

Penalty Information: Proposed: Final Monetary: \$90,000 Collected: \$90,000 Total Final: \$90,000

CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

OAM Evaluation: 09/24/1998 Activity Location: GA By: STATE Identifier: 002 Person: GASJB Suborganization: LD Found Violation: NO
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: - Former Eval Owner and Type: HQ OAM. Former Reason Owner and Code:

No Linked Violations

CEI Evaluation: 09/24/1998 Activity Location: GA By: STATE Identifier: 003 Person: GANRW Suborganization: LD Found Violation: NO
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: AZS CONTINUES TO REMAIN IN VIOLATIONS OF ITS PERMIT - Former Eval Owner and Type: HQ CEI. Former Reason Owner and Code:

No Linked Violations

CEI Evaluation: 12/09/1996 Activity Location: GA By: STATE Identifier: 001 Person: GANRW Suborganization: LD Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: AZS CONTINUES TO REMAIN IN VIOLATION OF ITS PERMIT - Former Eval Owner and Type: HQ CEI. Former Reason Owner and Code:

Violation: Activity Location: GA Type: 264.H Determined Date: 12/09/1996 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: 09/28/1998 Actual Compliance Date: 09/28/2000 RTC Qualifier: DOCUMENTED Sequence Number: 21

Former Citation - SR - PERMIT CONDITION II.M

Viol. Notes: FAILURE TO OPERATE THE CORRECTIVE ACTION SYSTEM

Enforcement: Activity Location: GA Type: 310 Action Date: 09/28/2000 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD

Penalty Information: Penalty Information Printed Above

CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enf. Notes:

Enforcement: Activity Location: GA Type: 120 Action Date: 01/02/1997 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD

Penalty Information: Penalty Information Printed Above

CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Comprehensive Compliance Monitoring and Enforcement Report

Page 9

Report run on: November 16, 2007 - 10:31 AM

This report may contain enforcement sensitive data.

AZS CORPORATION, GAD981237225, ATLANTA, GA, continued -

Violation: Activity Location: GA Type: 264.H Determined Date: 12/09/1996 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: 09/28/1998 Actual Compliance Date: 09/28/2000 RTC Qualifier: DOCUMENTED Sequence Number: 22

Former Citation - SR - PERMIT CONDITION I.F.3

Viol. Notes: FAILURE TO PROVIDE FINANCIAL ASSURANCE FOR POST CLOSURE CARE AND CA

Enforcement: Activity Location: GA Type: 310 Action Date: 09/28/2000 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD

Penalty Information: Penalty Information Printed Above

CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enf. Notes:

Enforcement: Activity Location: GA Type: 120 Action Date: 01/02/1997 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD

Penalty Information: Penalty Information Printed Above

CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Violation: Activity Location: GA Type: 265.F Determined Date: 12/09/1996 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: 09/28/1998 Actual Compliance Date: 09/28/2000 RTC Qualifier: DOCUMENTED Sequence Number: 23

Former Citation - SR - PERMIT CONDITION II.O.2

Viol. Notes: FAILURE TO SUBMIT SEMI ANNUAL EFFECTIVENESS REPORT

Enforcement: Activity Location: GA Type: 310 Action Date: 09/28/2000 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD

Penalty Information: Penalty Information Printed Above

CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enf. Notes:

Enforcement: Activity Location: GA Type: 120 Action Date: 01/02/1997 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD

Penalty Information: Proposed: Final Monetary: \$90,000 Collected: \$90,000 Total Final: \$90,000

CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

SNY Evaluation 12/09/1996 Activity Location: GA By: STATE Identifier: 002 Person: GANRW Suborganization: LD Found Violation: NO
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: - Former Eval Owner and Type: HQ SNY. Former Reason Owner and Code:

No Linked Violations

OAM Evaluation 11/26/1996 Activity Location: GA By: STATE Identifier: 001 Person: GASJB Suborganization: LD Found Violation: NO
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: - Former Eval Owner and Type: HQ OAM. Former Reason Owner and Code:

No Linked Violations

OAM Evaluation 12/15/1995 Activity Location: GA By: STATE Identifier: 001 Person: GASJB Suborganization: LD Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: - Former Eval Owner and Type: HQ OAM. Former Reason Owner and Code:

Comprehensive Compliance Monitoring and Enforcement Report

Page 10

Report run on: November 16, 2007 - 10:31 AM

This report may contain enforcement sensitive data.

AZS CORPORATION, GAD981237225, ATLANTA, GA, continued -

Violation: Activity Location: GA Type: 265.F Determined Date: 12/15/1995 Determined by Agency: STATE Responsible Agency: STATE
 Scheduled Compliance Date: Actual Compliance Date: 09/28/2000 RTC Qualifier: DOCUMENTED Sequence Number: 20

Former Citation - SR - CONDITION II.M.
 Viol. Notes: FAILURE TO OPERATE GW CORRECTION ACTION SYSTEM

Enforcement: Activity Location: GA Type: 310 Action Date: 09/28/2000 Identifier: 001
 Docket: Agency: STATE Responsible Person: GANRW Branch: LD
 Penalty Information: Proposed: Final Monetary: \$50,000 Collected: \$50,000 Total Final: \$50,000
 CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enf. Notes:
Enforcement: Activity Location: GA Type: 210 Action Date: 04/17/1996 Identifier: 001
 Docket: Agency: STATE Responsible Person: GANRW Branch: LD
 Penalty Information: Proposed: \$90,000 Final Monetary: Collected: Total Final:

CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:
Enforcement: Activity Location: GA Type: 210 Action Date: 02/06/1996 Identifier: 001
 Docket: Agency: STATE Responsible Person: GANRW Branch: LD
 CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enforcement: Activity Location: GA Type: 210 Action Date: 01/06/1996 Identifier: 001
 Docket: Agency: STATE Responsible Person: GANRW Branch: LD
 CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enforcement: Activity Location: GA Type: 120 Action Date: 01/04/1996 Identifier: 001
 Docket: Agency: STATE Responsible Person: GASJB Branch: LD
 CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

CEI Evaluation 12/15/1995 Activity Location: GA By: STATE Identifier: 002 Person: GANRW Suborganization: LD Found Violation: NO
 Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
 Eval. Notes: - Former Eval Owner and Type: HQ CEI. Former Reason Owner and Code:

No Linked Violations

CEI Evaluation 12/11/1995 Activity Location: GA By: STATE Identifier: 001 Person: GANRW Suborganization: LD Found Violation: NO
 Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
 Eval. Notes: NO VIOLATIONS NOTED AT THIS INSPECTION - Former Eval Owner and Type: HQ CEI. Former Reason Owner and Code:

No Linked Violations

CEI Evaluation 10/30/1995 Activity Location: GA By: STATE Identifier: 001 Person: GASJB Suborganization: LD Found Violation: YES
 Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area: V3
 Eval. Notes: VIOLATION DISCOVERED DURING REVIEW OF OFF-SITE INVESTIGATION REPORT - Former Eval Owner and Type: HQ OTH. Former Reason Owner and Code:

Comprehensive Compliance Monitoring and Enforcement Report

Page 11

Report run on: November 16, 2007 - 10:31 AM

This report may contain enforcement sensitive data.

AZS CORPORATION, GAD981237225, ATLANTA, GA, continued -

Violation: Activity Location: GA Type: 264.A Determined Date: 10/31/1995 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: 11/20/1995 Actual Compliance Date: 11/10/1995 RTC Qualifier: OBSERVED Sequence Number: 19
Former Citation - SR - 270.11
Viol. Notes: FAILURE TO SIGN 40 CFR 270.11 CERTIFICATION STATEMENT
Enforcement: Activity Location: GA Type: 120 Action Date: 11/02/1995 Identifier: 001
Docket: Agency: STATE Responsible Person: GASJB Branch: LD
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

CEI Evaluation 12/19/1994 Activity Location: GA By: STATE Identifier: 001 Person: GANRW Suborganization: LD Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: - Former Eval Owner and Type: HQ CEI. Former Reason Owner and Code:

Violation: Activity Location: GA Type: 264.I Determined Date: 12/16/1994 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: 01/25/1994 Actual Compliance Date: 01/04/1995 RTC Qualifier: OBSERVED Sequence Number: 18
Former Citation - SR - 264.170
Viol. Notes: FAILURE TOPROPERLY MANAGE A HAZARDOUS WASTE CONTAINER
Enforcement: Activity Location: GA Type: 120 Action Date: 12/23/1994 Identifier: 001
Docket: Agency: STATE Responsible Person: GANRW Branch: LD
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

OAM Evaluation 12/14/1994 Activity Location: GA By: STATE Identifier: 001 Person: GASJB Suborganization: LD Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: - Former Eval Owner and Type: HQ OAM. Former Reason Owner and Code:

Violation: Activity Location: GA Type: 265.F Determined Date: 12/15/1994 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: 01/31/1995 Actual Compliance Date: 01/20/1995 RTC Qualifier: OBSERVED Sequence Number: 17
Former Citation - SR - COND II.L.2.(i)
Viol. Notes: FAILED TO RESAMPLE FOR APP IX HITS
Enforcement: Activity Location: GA Type: 120 Action Date: 12/20/1994 Identifier: 001
Docket: Agency: STATE Responsible Person: GASJB Branch: LD
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:
Enf. Notes: NOV GIVES 30 DAYS TO COMPLY

Violation: Activity Location: GA Type: 265.F Determined Date: 12/14/1994 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: 01/31/1995 Actual Compliance Date: 01/20/1995 RTC Qualifier: OBSERVED Sequence Number: 16
Former Citation - SR - 264.97(d)(e)
Viol. Notes: FAILED TO PERFORM APPROPRIATE SAMPLING PROCEDURE
Enforcement: Activity Location: GA Type: 120 Action Date: 12/20/1994 Identifier: 001
Docket: Agency: STATE Responsible Person: GASJB Branch: LD
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:
Enf. Notes: NOV GIVES 30 DAYS TO COMPLY

Comprehensive Compliance Monitoring and Enforcement Report

Page 12

Report run on: November 16, 2007 - 10:31 AM

This report may contain enforcement sensitive data.

AZS CORPORATION, GAD981237225, ATLANTA, GA, continued -

Violation: Activity Location: GA Type: 265.F Determined Date: 12/08/1994 Determined by Agency: STATE Responsible Agency: STATE
 Scheduled Compliance Date: 01/31/1995 Actual Compliance Date: 01/20/1995 RTC Qualifier: OBSERVED Sequence Number: 14
 Former Citation - SR - COND I.B.2.(a)
 Viol. Notes: FAILED TO MAINTAIN COMPLETE COPY OF PERMIT APPL

Enforcement: Activity Location: GA Type: 120 Action Date: 12/20/1994 Identifier: 001
 Docket: Agency: STATE Responsible Person: GASJB Branch: LD
 CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:
 Enf. Notes: NOV GIVES 30 DAYS TO COMPLY

Violation: Activity Location: GA Type: 265.F Determined Date: 12/08/1994 Determined by Agency: STATE Responsible Agency: STATE
 Scheduled Compliance Date: 01/31/1995 Actual Compliance Date: 01/20/1995 RTC Qualifier: OBSERVED Sequence Number: 15
 Former Citation - SR - COND II.L.1
 Viol. Notes: FAILED TO MAINTAIN NON WELLS

Enforcement: Activity Location: GA Type: 120 Action Date: 12/20/1994 Identifier: 001
 Docket: Agency: STATE Responsible Person: GASJB Branch: LD
 CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:
 Enf. Notes: NOV GIVES 30 DAYS TO COMPLY

CEI Evaluation: 03/29/1994 Activity Location: GA By: STATE Identifier: 001 Person: GANRW Suborganization: LD Found Violation: NO
 Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
 Eval. Notes: - Former Eval Owner and Type: HQ CEI. Former Reason Owner and Code:

No Linked Violations

GME Evaluation: 03/08/1994 Activity Location: GA By: STATE Identifier: 001 Person: GARJR Suborganization: RS Found Violation: YES
 Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
 Eval. Notes: - Former Eval Owner and Type: HQ CME. Former Reason Owner and Code:

Violation: Activity Location: GA Type: 265.F Determined Date: 04/07/1994 Determined by Agency: STATE Responsible Agency: STATE
 Scheduled Compliance Date: Actual Compliance Date: 05/09/1994 RTC Qualifier: OBSERVED Sequence Number: 13
 Former Citation - SR - 264.97(c)
 Viol. Notes: FAILURE TO MAINTAIN WELLS WITH GENERAL GW REQUIREMENTS

Enforcement: Activity Location: GA Type: 120 Action Date: 04/11/1994 Identifier: 001
 Docket: Agency: STATE Responsible Person: GARJR Branch: RS
 CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:
 Enf. Notes: NOV

Violation: Activity Location: GA Type: 265.F Determined Date: 03/08/1994 Determined by Agency: STATE Responsible Agency: STATE
 Scheduled Compliance Date: 05/14/1994 Actual Compliance Date: 05/12/1994 RTC Qualifier: OBSERVED Sequence Number: 9
 Former Citation - SR - PERMIT II L.1.(a)
 Viol. Notes: FAILURE TO PREVENT ACCUMULATIVE OF WATER M.W. 1&2

Enforcement: Activity Location: GA Type: 120 Action Date: 04/11/1994 Identifier: 001
 Docket: Agency: STATE Responsible Person: GARJR Branch: RS
 CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:
 Enf. Notes: NOV

Comprehensive Compliance Monitoring and Enforcement Report

Page 13

Report run on: November 16, 2007 - 10:31 AM

This report may contain enforcement sensitive data.

AZS CORPORATION, GAD981237225, ATLANTA, GA, continued -

Violation: Activity Location: GA Type: 265.F Determined Date: 03/08/1994 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: 05/14/1994 Actual Compliance Date: 05/12/1994 RTC Qualifier: OBSERVED Sequence Number: 10

Former Citation - SR - PERMIT COND II.L.1 (a)
Viol. Notes: FAILURE TO LOCK M.W. 15 & 22

Enforcement: Activity Location: GA Type: 120 Action Date: 04/11/1994 Identifier: 001
Docket: Agency: STATE Responsible Person: GARJR Branch: RS
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:
Enf. Notes: NOV

Violation: Activity Location: GA Type: 265.F Determined Date: 03/08/1994 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: 05/14/1994 Actual Compliance Date: 05/12/1994 RTC Qualifier: OBSERVED Sequence Number: 11

Former Citation - SR - PERMIT COND II.L.1.(a)
Viol. Notes: FAILUE TO REPAIR CONCRETE APRON M.W. 25

Enforcement: Activity Location: GA Type: 120 Action Date: 04/11/1994 Identifier: 001
Docket: Agency: STATE Responsible Person: GARJR Branch: RS
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:
Enf. Notes: NOV

Violation: Activity Location: GA Type: 265.F Determined Date: 03/08/1994 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: 05/14/1994 Actual Compliance Date: 05/12/1994 RTC Qualifier: OBSERVED Sequence Number: 12

Former Citation - SR - PERMIT CONDITION II.L.1(a)
Viol. Notes: FAILURE TO HAVE REFERENCE POINT MARKED ON M.W. 25

Enforcement: Activity Location: GA Type: 120 Action Date: 04/11/1994 Identifier: 001
Docket: Agency: STATE Responsible Person: GARJR Branch: RS
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:
Enf. Notes: NOV

Violation: Activity Location: GA Type: 264.A Determined Date: 09/09/1993 Determined by Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: 10/27/1993 Actual Compliance Date: 10/27/1993 RTC Qualifier: OBSERVED Sequence Number: 8

Former Citation - SR - 270.11

Enforcement: Activity Location: GA Type: 120 Action Date: 09/09/1993 Identifier: 001
Docket: Agency: STATE Responsible Person: GASJB Branch: LD
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

NRR Evaluation: 09/09/1993 Activity Location: GA By: STATE Identifier: 001 Person: GASJB Suborganization: LD Found Violation: NO
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: VIOLATION DISCOVERED DURING SEMI-ANNUAL EFFECTIVENESS REPORT REVIEW - Former Eval Owner and Type: HQ NRR. Former Reason Owner and Code:

No Linked Violations

FRR Evaluation: 05/21/1993 Activity Location: GA By: STATE Identifier: 001 Person: GANRW Suborganization: LD Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: TRUST AGREEMENT DOCUMENT REVIEWED - Former Eval Owner and Type: HQ FRR. Former Reason Owner and Code:

Comprehensive Compliance Monitoring and Enforcement Report

Page 14

Report run on: November 16, 2007 - 10:31 AM

This report may contain enforcement sensitive data.

AZS CORPORATION, GAD981237225, ATLANTA, GA, continued -

Violation: Activity Location: GA	Type: 264.H	Determined Date: 05/21/1993	Determined by Agency: STATE	Responsible Agency: STATE
Scheduled Compliance Date:		Actual Compliance Date: 06/11/1993	RTC Qualifier: OBSERVED	Sequence Number: 7
Former Citation - SR - 264.145(a)(1)				
Enforcement: Activity Location: GA	Type: 110	Action Date: 05/21/1993	Identifier: 001	
Docket:	Agency: STATE	Responsible Person: GANRW	Branch: LD	
CA Component: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:	
Enf. Notes: VIOLATION CORRECTED ON 6-11-93				

NRR Evaluation: 03/26/1993	Activity Location: GA	By: STATE	Identifier: 001	Person: GASJB	Suborganization: LD	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: GROUNDWATER REVIEW - Former Eval Owner and Type: HQ NRR. Former Reason Owner and Code: GA 20						

No Linked Violations

NRR Evaluation: 03/22/1993	Activity Location: GA	By: STATE	Identifier: 001	Person: GANRW	Suborganization: LD	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: GROUNDWATER REVIEW - Former Eval Owner and Type: HQ NRR. Former Reason Owner and Code: GA 20						

No Linked Violations

CEI Evaluation: 02/17/1993	Activity Location: GA	By: STATE	Identifier: 001	Person: GANRW	Suborganization: LD	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: NO VIOLATIONS NOTED - Former Eval Owner and Type: HQ CEI. Former Reason Owner and Code:						

No Linked Violations

CEI Evaluation: 06/23/1992	Activity Location: GA	By: STATE	Identifier: 001	Person: GANRW	Suborganization: LD	Found Violation: YES
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: IN CONJUNCTION WITH OAM INSPECTION BY ROBERT RINGER - Former Eval Owner and Type: HQ CEI. Former Reason Owner and Code:						

Violation: Activity Location: GA	Type: 265.F	Determined Date: 08/21/1992	Determined by Agency: STATE	Responsible Agency: STATE
Scheduled Compliance Date:		Actual Compliance Date: 10/05/1992	RTC Qualifier: OBSERVED	Sequence Number: 6
Former Citation - SR - 264.97				
Viol. Notes: FAILURE TO MAINTAIN WELLS WITH GENERAL GW REQUIREMENTS				

Enforcement: Activity Location: GA	Type: 120	Action Date: 09/04/1992	Identifier: 001	
Docket:	Agency: STATE	Responsible Person: GARJR	Branch: LD	
CA Component: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:	

OAM Evaluation: 06/23/1992	Activity Location: GA	By: STATE	Identifier: 002	Person: GARJR	Suborganization: LD	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: - Former Eval Owner and Type: HQ OAM. Former Reason Owner and Code:						

No Linked Violations

Comprehensive Compliance Monitoring and Enforcement Report

Page 15

Report run on: November 16, 2007 - 10:31 AM

This report may contain enforcement sensitive data.

AZS CORPORATION, GAD981237225, ATLANTA, GA, continued -

CEI Evaluation	02/18/1991	Activity Location: GA	By: STATE	Identifier: 011	Person: GANRW	Suborganization: LD	Found Violation: YES
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: - Former Eval Owner and Type: HQ CEI. Former Reason Owner and Code:							

Violation:	Activity Location: GA	Type: 264.B	Determined Date: 02/23/1991	Determined by Agency: STATE	Responsible Agency: STATE
	Scheduled Compliance Date:		Actual Compliance Date: 04/19/1991	RTC Qualifier: OBSERVED	Sequence Number: 2
	Former Citation - SR - 262.34C12				
	Viol. Notes: FAILURE TO ID HW				
	No Linked Enforcements				

Violation:	Activity Location: GA	Type: 264.G	Determined Date: 02/23/1991	Determined by Agency: STATE	Responsible Agency: STATE
	Scheduled Compliance Date:		Actual Compliance Date: 04/19/1991	RTC Qualifier: OBSERVED	Sequence Number: 3
	Former Citation - SR - 264.119				
	Viol. Notes: FAILURE TO NOTIFY LOCAL LAND AUTHORITY				
	No Linked Enforcements				

Violation:	Activity Location: GA	Type: 264.G	Determined Date: 02/23/1991	Determined by Agency: STATE	Responsible Agency: STATE
	Scheduled Compliance Date:		Actual Compliance Date: 04/19/1991	RTC Qualifier: OBSERVED	Sequence Number: 4
	Former Citation - SR - 264.310				
	Viol. Notes: FAILURE TO CONDUCT LANDFILL INSPECTIONS				
	No Linked Enforcements				

Violation:	Activity Location: GA	Type: 264.B	Determined Date: 02/23/1991	Determined by Agency: STATE	Responsible Agency: STATE
	Scheduled Compliance Date:		Actual Compliance Date: 04/19/1991	RTC Qualifier: OBSERVED	Sequence Number: 5
	Former Citation - SR - 264.15B1				
	Viol. Notes: FAILURE TO INSPECT MONITORING WELLS PERIODICALLY				
	No Linked Enforcements				

Violation:	Activity Location: GA	Type: 265.F	Determined Date: 02/18/1991	Determined by Agency: STATE	Responsible Agency: STATE
	Scheduled Compliance Date:		Actual Compliance Date: 04/12/1991	RTC Qualifier: OBSERVED	Sequence Number: 1
	No Linked Enforcements				

CEI Evaluation	10/02/1990	Activity Location: GA	By: STATE	Identifier: 010	Person:	Suborganization:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: - Former Eval Owner and Type: HQ CEI. Former Reason Owner and Code:							

No Linked Violations

Total Number of Handlers: 1

Total Number of Activity Locations: 1

* End of Report *

Comprehensive Compliance Monitoring and Enforcement Report

Page 16

Report run on: November 16, 2007 - 10:31 AM

This report may contain enforcement sensitive data.

Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
EI Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

Comprehensive Compliance Monitoring and Enforcement Report

Page 17

Report run on: November 16, 2007 - 10:31 AM

This report may contain enforcement sensitive data.

Description of codes used on the report:

ACCESSIBILITY - indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator).	
Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority.	
Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	indicates that the handler is a former non-notifier
X	indicates that the handler is a non-notifier

BY	
By indicates the agency who performed the evaluation/inspection.	

FOUND VIOLATION - indicates whether or not the evaluation discovered a violation.	
Code	Description
Yes	indicates that the evaluation did find violations.
No	indicates that the evaluation did not find violations.
U	indicates that it is undetermined at this time. The agency may still be determining whether violations existed.

Evaluation Type	Description
OAM	OPERATION AND MAINTENANCE INSPECTION
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE
SNN	NOT A SIGNIFICANT NON-COMPLIER
CAC	CORRECTIVE ACTION COMPLIANCE EVALUATION
GME	GROUNDWATER MONITORING EVALUATION
FCI	FOCUSED COMPLIANCE INSPECTION
FRR	FINANCIAL RECORD REVIEW

Comprehensive Compliance Monitoring and Enforcement Report

Report run on: November 16, 2007 - 10:31 AM

This report may contain enforcement sensitive data.

Description of codes used on the report:

NRR	NON-FINANCIAL RECORD REVIEW
SNY	SIGNIFICANT NON-COMPLIER

Focus Area	Description
V3	CONVERTED FROM V2 RCRAINFO

Violation Type	Description
265.F	TSD IS-GROUND-WATER MONITORING
264.B	TSD - GENERAL FACILITY STANDARDS
264.H	TSD - FINANCIAL REQUIREMENTS
264.G	TSD - CLOSURE/POST-CLOSURE
264.A	TSD - GENERAL
264.I	TSD - CONTAINER USE AND MANAGEMENT
262.A	GENERATORS - GENERAL

Enforcement Type	Description
120	WRITTEN INFORMAL
110	VERBAL INFORMAL
210	INITIAL 3008(A) COMPLIANCE
310	FINAL 3008(A) COMPLIANCE ORDER

Comprehensive Corrective Action Report

Report run on: November 16, 2007 - 10:31 AM

Version: 3.0

User Selection Criteria

Location: National

Handler Name:

Handler ID: GAD981237225

Group of IDs: Not Chosen

County Code:

Results

Data meeting the criteria you selected follows.

Total Pages: 4

Total Handlers:1

Report Description

This report lists **ALL** corrective action data for all facilities that meet the selection criteria. Events not linked to authorities and areas – considered "orphan" events or "one parent" events -- are displayed on this report. Areas and authorities not linked to events "orphans" are also displayed.

Report Information

Name: compca.rdf
Developed by: EPA Headquarters, Office of Solid Waste
Deployed: November 2002
Last Updated: January 2006
Contact: rcrainfo.help@epa.gov
Tables Used: hbasic, hreport_univ3, aevent, aarea, aca_authority, aln_area_event, aln_event_authority, lu_authority, lu_ca_event, lu_state, gpra_ca, hid_groups
Libraries: decodes.pll

Comprehensive Corrective Action Report

Page 2

Report run on: November 16, 2007 - 10:31 AM

List of Handler Universe Abbreviations

Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
EI Indicator (HE/GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Perm Prgrs	Indicates that the facility is part of the Permitting/Closure/Post-Closure Progress universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
PermWrkld	Indicates that the facility is part of the Permit Workload universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
Clos Wrkld	Indicates that the facility is part of the Closure Workload universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
Pclos Wrkld	Indicates that the facility is part of the Post-Closure Workload universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
Permits GPRA 06	Indicates that the facility is part of the Permits GPRA 2006 universe. ('+' indicates that the facility is on the Permits GPRA 2006 Baseline and meeting the goal; '-' indicates that the facility is on the Permits GPRA 2006 Baseline and not meeting the goal; 'N' indicates that the facility is not on the Permits GPRA 2006 Baseline)
Renewals GPRA 06	Indicates that the facility is part of the Renewals GPRA 2006 universe. ('+' indicates that the facility is on the Renewals GPRA 2006 Baseline and meeting the goal; '-' indicates that the facility is on the Renewals GPRA 2006 Baseline and not meeting the goal; 'N' indicates that the facility is not on the Renewals GPRA 2006 Baseline)
Subj CA	Indicates that the facility is part of the Subject to Corrective Action universe. ('Y' indicates that the facility is in this universe).
Subj CA TSD 3004	Indicates that the facility is a Treatment, Storage or Disposal facility Potentially Subject to Corrective Action Under 3004(u)/(v). ('Y' indicates that the facility is in this universe).
Subj CA TSD Discr	Indicates that the facility is a Treatment, Storage or Disposal facility Subject to Corrective Action Under Discretionary Authorities. ('Y' indicates that the facility is in this universe).
Subj CA Non-TSD	Indicates that the facility is a Non-Treatment, Storage or Disposal facility where Corrective Action has been imposed. ('Y' indicates that the facility is in this universe).
CA Wrkld	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
CA GPRA 08	Indicates that the facility is part of the Corrective Action GPRA 2008 universe. ('Y' indicates that the facility is in this universe).

Comprehensive Corrective Action Report

Report run on: November 16, 2007 - 10:31 AM

AZS CORPORATION		County Name / Code: FULTON / GA121				GAD981237225	
Location: 762 MARIETTA BLVD, ATLANTA, GA 30318		Region 04					
Mailing: PO BOX 3020, COVINGTON, GA 30015							
Activity Location: GA	State District: TJB	Non-Notifier:	Extract: Y	Active: Y			
Generator: SQG	Transporter: N	Operating TSDF: ----	IC In Place: N	El Indicator (HE / GW):+ / +			
Perm Prgrs: L---	Pclos Wrkld: L---	Subj CA: Y	Subj CA Non-TSD:N	CA GPRA 08: Y			
Perm Wrkld: ----	Permits GPRA 06: +	Subj CA TSD 3004:Y	CA Wrkld: Y				
Clos Wrkld: ----	Renewals GPRA 06: N	Subj CA TSD Discr:N					
CA Authority:		Suborg:	Staff	Attny	Resp. Agcy	Loc.	Issue Date
Post-Closure Permit		LD	GASJB	GA	State	GA	09/30/1987
*RCRA 3004(u) or equivalent		Effective Date: 10/30/1987					
Area Name	Seq.	Releases:	GW:	SW:	Soil:	Air:	Facilitywide:
ENTIRE FACILITY	1						Y
Event Code	Seq.	Resp. Agcy	Act Loc.	Actual Date	Sched. Orig.	Sched. New	
CA750YE	1	State	GA	09/08/2006			
RELEASE TO GW CONTROLLED DETERMINATION-YES, APPLICABLE AS OF THIS DATE							
CA725YE	1	State	GA	09/08/2006			
HUMAN EXPOSURES CONTROLLED DETERMINATION-YES, APPLICABLE AS OF THIS DATE							
CA075LO	1	State	GA	08/28/2006			
CA PRIORITIZATION-LOW CA PRIORITY							
CA932	2	State	GA	11/07/1995			
NOD ON SEMI-ANNUAL EFFECTIVENESS REVIEW							
CA931	4	State	GA	10/31/1995			
SEMI-ANNUAL EFFECTIVENESS REVIEW							
CA932	1	State	GA	02/23/1995			
NOD ON SEMI-ANNUAL EFFECTIVENESS REVIEW							
CA931	3	State	GA	02/20/1995			
SEMI-ANNUAL EFFECTIVENESS REVIEW							
Area Name	Seq.	Releases:	GW:	SW:	Soil:	Air:	Facilitywide:
SURFACE IMPOUNDMENTS-POLYMER & SERIES	2						N
Event Code	Seq.	Resp. Agcy	Act Loc.	Actual Date	Sched. Orig.	Sched. New	
CA932	3	State	GA	11/15/2006			
NOD ON SEMI-ANNUAL EFFECTIVENESS REVIEW							
Notes: OCT 2005-NOV 2006 SEMI ANNUAL RPT							
CA931	5	State	GA	10/27/2006			
SEMI-ANNUAL EFFECTIVENESS REVIEW							
Notes: OCT 2005-APR 2006 SEMI ANNUAL RPT							
CA931	2	State	GA	09/09/1993			
SEMI-ANNUAL EFFECTIVENESS REVIEW							
Notes: REPORT DATED 4-13-93							
CA931	1	State	GA	03/23/1993			
SEMI-ANNUAL EFFECTIVENESS REVIEW							
Notes: REPORT DATED 12/92							
CA Authority		Suborg.	Staff	Attny	Resp. Agcy	Loc.	Issue Date
Operating Permit			GA		State	GA	09/25/1987
*Other, specified by Legal Authority Citation		Effective Date: 09/25/1987					
Area Name	Seq.	Releases:	GW:	SW:	Soil:	Air:	Facilitywide:
ENTIRE FACILITY	1						Y
Event Code	Seq.	Resp. Agcy	Act Loc.	Actual Date	Sched. Orig.	Sched. New	
CA100	1	State	GA	09/25/1987			
RFI IMPOSITION							
CA050	1	EPA	GA	06/03/1987			
RFA COMPLETED							
CA100	2	State	GA	01/09/1985			
RFI IMPOSITION							
Notes: HWDMS CLEAN UP FROM OP441							
Area Name	Seq.	Releases:	GW:	SW:	Soil:	Air:	Facilitywide:
SURFACE IMPOUNDMENTS-	2						N

Comprehensive Corrective Action Report

Page 4

Report run on: November 16, 2007 - 10:31 AM

AZS CORPORATION - continued						GAD981237225																																																		
CA Authority	Suborg.	Staff	Attny	Resp. Agcy	Loc.	Issue Date	Effective Date																																																	
Operating Permit		GA		State	GA	09/25/1987	09/25/1987																																																	
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* End of Report *

Comprehensive Permitting Report

Report run on: November 16, 2007 - 10:32 AM

Version: 3.0

User Selection Criteria

Location: None Chosen

County: All County Codes.

Handler Name:

Handler ID: GAD981237225

Group of IDs: None Chosen

Results

Data meeting the criteria you selected follows.

Total Pages: 5

Total Handlers: 1

Report Description

This report lists all permitting data for all facilities that meet the selection criteria. Unlinked Events are shown for each facility, as are Units that are not linked to either an Event or Unit Detail.

Report Information

Name: compperm.rdf
Developed by: EPA Headquarters, Office of Solid Waste
Deployed: November 2002
Last Updated: March 2007
Contact: rcrainfo.help@epa.gov
Tables Used: hreport_univ3, pseries, pevent, pln_event_unit, punit_detail, punit, lu_state, hid_groups, gpra_ca, aevent, aln_area_event, aarea
Libraries: decodes.pll

Report run on: November 16, 2007 - 10:32 AM

List of Handler Universe Abbreviations

Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
El Indicator (HE/GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Perm Prgrs	Indicates that the facility is part of the Permitting/Closure/Post-Closure Progress universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
PermWrkld	Indicates that the facility is part of the Permit Workload universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
Clos Wrkld	Indicates that the facility is part of the Closure Workload universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
Pclos Wrkld	Indicates that the facility is part of the Post-Closure Workload universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
Permits GPRA 06	Indicates that the facility is part of the Permits GPRA 2006 universe. ('+' indicates that the facility is on the Permits GPRA 2006 Baseline and meeting the goal; '-' indicates that the facility is on the Permits GPRA 2006 Baseline and not meeting the goal; 'N' indicates that the facility is not on the Permits GPRA 2006 Baseline)
Renewals GPRA 06	Indicates that the facility is part of the Renewals GPRA 2006 universe. ('+' indicates that the facility is on the Renewals GPRA 2006 Baseline and meeting the goal; '-' indicates that the facility is on the Renewals GPRA 2006 Baseline and not meeting the goal; 'N' indicates that the facility is not on the Renewals GPRA 2006 Baseline)
Subj CA	Indicates that the facility is part of the Subject to Corrective Action universe. ('Y' indicates that the facility is in this universe).
Subj CA TSD 3004	Indicates that the facility is a Treatment, Storage or Disposal facility Potentially Subject to Corrective Action Under 3004(u)(v). ('Y' indicates that the facility is in this universe).
Subj CA TSD Discr	Indicates that the facility is a Treatment, Storage or Disposal facility Subject to Corrective Action Under Discretionary Authorities. ('Y' indicates that the facility is in this universe).
Subj CA Non-TSD	Indicates that the facility is a Non-Treatment, Storage or Disposal facility where Corrective Action has been imposed. ('Y' indicates that the facility is in this universe).
CA Wrkld	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
CA GPRA 08	Indicates that the facility is part of the Corrective Action GPRA 2008 universe. ('Y' indicates that the facility is in this universe).

Report run on: November 16, 2007 10:32 AM

Activity Location: GA	State District: TJB	Non-Notifier:	Extract: Y	Active: Y
Generator: SQG	Transporter: N	Operating TSDf: ----	IC In Place: N	EI Indicator (HE / GW): + / +
Perm Prgrs: L----	Pclos Wrkld: L----	Subj CA: Y	Subj CA Non-TSD: N	CA GPRA 08: Y
Perm Wrkld:----	Permits GPRA 06: +	Subj CA TSD 3004: Y	CA Wrkld: Y	
Clos Wrkld: ----	Renewals GPRA 06: N	Subj CA TSD Discr: N		

Series Name	Seq.
CLOSURE/PC	1

Unit Name	Seq.	Process Code/ Legal and Operating Status/Notes	# Units	Capacity	UOM	Effective Date	
POLYMER POND	1-1	SURFACE IMPOUNDMENT STORAGE Interim Status - Operating, Actively Managing Rcra-regulated Waste	1	17,500.00	Gal	11/22/1985	
Event	Owner	Event Seq.	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New
PC380	HQ	2	STATE	GA	12/11/1987		
Description: CLOSURE VERIFICATION							
Notes: REEXAMINED LAND DISPOSAL CLOSURE.							
PC380	HQ	1	STATE	GA	07/24/1987		
Description: CLOSURE VERIFICATION							
PC370YE	HQ	1	STATE	GA	07/10/1987		
Description: RECEIVE CLOSURE CERTIFICATION-ACCORDING TO PLAN							
PC360ME	HQ	1	STATE	GA	12/31/1986		
Description: PLAN APPROVED - CLOSURE/POST-CLOSURE-FINAL CLOSURE							
PC340CL	US	1	STATE	GA	11/24/1986		
Description: PUBLIC NOTICE - CLOSURE/POST-CLOSURE-CLOSURE							
Notes: ALSO PUBLIC NOTICE ON PUBLIC HEARING.							
PC340PC	US	2	STATE	GA	11/24/1986		
Description: PUBLIC NOTICE - CLOSURE/POST-CLOSURE-POST CLOSURE							
Notes: ALSO PUBLIC NOTICE ON PUBLIC HEARING.							
PC310CL	HQ	1	STATE	GA	11/22/1985		
Description: PLAN RECEIVED - CLOSURE/POST-CLOSURE-CLOSURE							
PC310PC	HQ	2	STATE	GA	11/22/1985		
Description: PLAN RECEIVED - CLOSURE/POST-CLOSURE-POST CLOSURE							

Unit Name	Seq.	Process Code/ Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date	
POLYMER POND	1-2	SURFACE IMPOUNDMENT STORAGE Post-closure Permitted - Closed With Waste In Place	1	17,500.00	Gal	09/30/1987	
Event	Owner	Event Seq.	Resp. Agcy	Act Loc.	Actual Date	Sched. Orig.	Sched. New
PC413	US	1	STATE	GA	09/30/1987		
Description: POST-CLOSURE PERIOD BEGUN							
PC417	US	1	STATE	GA	09/02/1987		
Description: FACILITY RELEASED FROM CLOSURE REQUIREMT							
PC350CL	US	1	STATE	GA	12/29/1986		
Description: PUBLIC HEARING - CLOSURE/POST-CLOSURE-CLOSURE							
PC330CL	HQ	1	STATE	GA	10/21/1986		
Description: REVISIONS RECEIVED-CLOSURE/POST-CLOSURE-CLOSURE							
PC330PC	HQ	2	STATE	GA	10/21/1986		
Description: REVISIONS RECEIVED-CLOSURE/POST-CLOSURE-POST CLOSURE							

Unit Name	Seq.	Process Code/ Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date	
SERIES PONDS	3-2	SURFACE IMPOUNDMENT STORAGE Post-closure Permitted - Closed With Waste In Place	1	38,313.00	Gal	09/30/1987	
Event	Owner	Event Seq.	Resp. Agcy	Act Loc.	Actual Date	Sched. Orig.	Sched. New
PC413	US	1	STATE	GA	09/30/1987		
Description: POST-CLOSURE PERIOD BEGUN							
PC417	US	1	STATE	GA	09/02/1987		
Description: FACILITY RELEASED FROM CLOSURE REQUIREMT							
PC350CL	US	1	STATE	GA	12/29/1986		
Description: PUBLIC HEARING - CLOSURE/POST-CLOSURE-CLOSURE							
PC330CL	HQ	1	STATE	GA	10/21/1986		
Description: REVISIONS RECEIVED-CLOSURE/POST-CLOSURE-CLOSURE							
PC330PC	HQ	2	STATE	GA	10/21/1986		
Description: REVISIONS RECEIVED-CLOSURE/POST-CLOSURE-POST CLOSURE							

Comprehensive Permitting Report

Page 4

Report run on: November 16, 2007 10:32 AM

Series Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date
PC PERMIT	3					
POLYMER POND	1-2	SURFACE IMPOUNDMENT STORAGE Post-closure Permitted - Closed With Waste In Place	1	17,500.00	Gal	09/30/1987
		Event Owner Event Seq. Resp. Agcy Act Loc. Actual Date Sched. Orig. Sched. New				
		PC100 US 2 STATE GA 06/28/1999 06/28/1999 06/28/1999				
		Description: NOTICE OF DEFICIENCY				
		Notes: NOD ISSUED				
		PC020 US 2 STATE GA 06/01/1999 06/01/1999 06/01/1999				
		Description: POST-CLOSURE PART B RECEIVED				
		Notes: PART B RECEIVED				
SERIES PONDS	3-1	SURFACE IMPOUNDMENT STORAGE Interim Status - Operating, Actively Managing Rcra-regulated Waste	1	38,313.00	Gal	03/31/1986
		Event Owner Event Seq. Resp. Agcy Act Loc. Actual Date Sched. Orig. Sched. New				
		PC270 US 1 STATE GA 09/30/1997 09/30/1997				
		Description: PERMIT EXPIRES				
		PC250 US 1 STATE GA 02/11/1993 03/31/1993 03/31/1993				
		Description: PERMIT REVIEWED				
		Notes: 5 YEAR PERMIT REVIEW				
		PC200PJ HQ 1 STATE GA 09/30/1987				
		Description: FINAL DETERMINATION-RCRA PERMIT ISSUED WITH HSWA CA SCHED.				
		PC417 US 1 STATE GA 09/30/1987				
		Description: FACILITY RELEASED FROM CLOSURE REQUIREMT				
		PC160DP HQ 1 STATE GA 08/11/1987				
		Description: PUBLIC NOTICE-DRAFT PERMIT ISSUED				
		PC150 US 1 STATE GA 08/05/1987				
		Description: DETERMINED TO BE COMPLETE/TECH ADEQUATE				
		PC110CO US 1 STATE GA 07/31/1987				
		Description: REVISIONS RECEIVED-COMplete				
		PC100 US 1 STATE GA 05/05/1987				
		Description: NOTICE OF DEFICIENCY				
		PC020 US 1 STATE GA 02/27/1987				
		Description: POST-CLOSURE PART B RECEIVED				
		PC010 HQ 1 STATE GA 03/31/1986				
		Description: POST-CLOSURE PART B CALL-IN				
SERIES PONDS	3-2	SURFACE IMPOUNDMENT STORAGE Post-closure Permitted - Closed With Waste In Place	1	38,313.00	Gal	09/30/1987
		Event Owner Event Seq. Resp. Agcy Act Loc. Actual Date Sched. Orig. Sched. New				
		PC100 US 2 STATE GA 06/28/1999 06/28/1999 06/28/1999				
		Description: NOTICE OF DEFICIENCY				
		Notes: NOD ISSUED				
		PC020 US 2 STATE GA 06/01/1999 06/01/1999 06/01/1999				
		Description: POST-CLOSURE PART B RECEIVED				
		Notes: PART B RECEIVED				
STORAGE TANK	4-1	TANK STORAGE Interim Status Terminated - PROTECTIVE FILER Notes: HWDMS CLEAN UP	1	8,136.00	Gal	06/24/1984
		Event Owner Event Seq. Resp. Agcy Act Loc. Actual Date Sched. Orig. Sched. New				
		PC100 US 2 STATE GA 06/28/1999 06/28/1999 06/28/1999				
		Description: NOTICE OF DEFICIENCY				
		Notes: NOD ISSUED				
		PC020 US 2 STATE GA 06/01/1999 06/01/1999 06/01/1999				
		Description: POST-CLOSURE PART B RECEIVED				
		Notes: PART B RECEIVED				
WITHDRAWN OP	2					
STORAGE	4-1	TANK STORAGE	1	8,136.00	Gal	06/24/1984

Comprehensive Permitting Report

Page 5

Report run on: November 16, 2007 10:32 AM

Series Name	Seq						
WITHDRAWN OP	2						
Unit Name	Seq	Process Code/ Legal and Operating Status // Notes	Units	Capacity	UOM	Effective Date	
STORAGE TANK		Interim Status Terminated - PROTECTIVE FILER Notes: HWDMS CLEAN UP					
Event	Owner	Event Seq	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New
OP190AR	US	1	STATE	GA	12/23/1985		
Description: WITHDRAWAL REQUEST DETERMINATION-APPROVED REQUEST							
OP180LN	US	1	STATE	GA	10/09/1985		
Description: RECEIVED WITHDRAWAL REQUEST-APPLIC. HAS/WILL GO IT 90 DAYS STORAGE							
OP100	US	1	STATE	GA	07/16/1985		
Description: NOTICE OF DEFICIENCY							
OP110IN	US	1	STATE	GA	01/15/1985	01/15/1985	01/15/1985
Description: REVISIONS RECEIVED-INCOMPLETE							
OP020	US	2	STATE	GA	12/15/1984		
Description: PART B RECEIVED							
OP010	HQ	1	STATE	GA	06/25/1984		
Description: PART B CALL-IN							
Unlinked Units and Seq. No.							
Unlinked Events	Owner	Event Seq	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New

* End of Report *

RCRA Site Detail

Report run on: November 16, 2007 - 10:33 AM

Version 3.0

User Selection Criteria

Handler EPA ID: GAD057288144

Activity Location: GEORGIA

History: All records

WAR Cycles: Show all

Results

Data meeting the criteria you selected follows.

Total Pages: 6

Report Description

The RCRA Site Detail report provides "all available details" from the handler module and summarized information from the waste activity monitoring module for one RCRA site. The report integrates National Biennial RCRA Hazardous Waste Report data with Site Identification data.

Details reported about the RCRA site include basic handler module information; the standard suite of universes; information about each source record received for the facility, including basic information, location and mailing address, source record and permit contact person (including historical records), list of NAICS codes, complete list of regulated waste activities; and summarized National Biennial RCRA Hazardous Waste Report information by reporting cycle year, including quantity totals (generated, managed, shipped, received), and top ten GM forms by quantity generated. Top ten GM form list shows reported waste description, quantities, onsite and offsite system types, and EPA and State waste codes.

Information listed for the RCRA site can be limited by activity location, latest historical information, and most recent BR cycle.

Data is sorted by Activity Location, most recent Received Date, and highest sequence number, with the exception that the activity location matching the site's location state is sorted to the top.

Report Information

Name: sitedetail.rdf
Developed by: EPA Headquarters, Office of Solid Waste
Deployed: November 2002
Last Revised: June 2007
Contact: rcrainfo.help@epa.gov
Tables Used: hbasic, hreport_univ3, hprevious_id, hhandler2, lu_country, howner_operator2, hnaics, lu_naics, hstate_activity, hother_permit2, huniversal_waste, lu_universal_waste, hwaste_code, bgm_basic, bgm_onsite_treatment, bgm_offsite_shipment, bwr_basic, bwr_waste_code, lu_management_method, gpra_ca, aeevent, aln_area_event, aarea, lu_state, hid_groups
Libraries: decodes.pll

NOTE: Some data is suppressed if it is null or blank. See documentation in RCRAInfo Help for details.

RCRA Site Detail

Report run on: November 16, 2007 - 10:33 AM

Page 2

List of Hazardous Waste Code Descriptions

Please run the lookup table report for LU_WASTE_CODES for description of federal and state waste codes in this report.

List of Handler Universe Abbreviations

Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
EI Indicator (HE/GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)

RCRA Site Detail

Report run on: November 16, 2007 - 10:33 AM

Page 3

GAD057288144 CARGILL INC.

EPA Region 04 Extract Flag: Y Facility Identifier: County: FULTON

Universe: Generator: N Transporter: N Active: N
Operating TSDF: --- IC In Place: N EI Indicator (HE / GW): N / N

Activity Location: GA Source Type: Notification Seq. Number: 1 Receive Date: 28 APR 1998

Other/Previous Site Name: CARGILL INC.

Location 762 MARIETTA BLVD NW Address: ATLANTA, GA 30318	Mailing Address: C/O HAZ LABS 2264 NW PKWY SUITE F MARIETTA, GA 30067
---	--

Contact Person JACK MIZNER C/O HAZ LABS
For Source (404) 988-8184 2264 NW PKWY SUITE F
Information MARIETTA, GA 30067

Owner (current) 1700 WATER PLACE SUITE 204 Type: Private
AZS CORPORATION ATLANTA, GA 30339 Phone: (404) 956-1100
From: To:

Land Type: Private Non Notifier: No Commercial Availability: Other - U Tsd Date:
Accessibility: No. Employees: State District: GTT

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State: HQ-N Not a Generator

Transfer Facility: Unknown	Used Oil Activities	
Other Hazardous Waste Generator Activities	Used Oil Transporter Activity	Off-Specification Used Oil Burner: No
Importer Activity: Unknown	Transporter: No	Used Oil Fuel Marketer Activity
Mixed Waste Generator: Unknown	Transfer Facility: No	Marketer who directs shipment off-specification used oil to off-specification used oil burner: No
Transporter Activity: No	Used Oil Processor and/or Re-refiner Activity	Marketer who first claims the used oil meets the specifications: No
TSDF Activity: No	Processor: No	
Recycler Activity: No	Refiner: No	
Exempt Boiler and/or Industrial Furnace	Underground Injection Control: No	Destination Facility for Universal Waste:
Small Quantity Onsite Burner Exemption: Unknown		
Smelting, melting, Refining Furnace Exemption: Unknown		

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D001, D002, F003, F005, U007, U009, U113, U147, U154, U159, U190, U194, U220, U239

Activity Location: GA Source Type: Biennial Report Seq. Number: 2 Receive Date: 18 MAR 1994 Report Cycle: 1993

Other/Previous Site Name: CARGILL INC.

Location 762 MARIETTA BLVD Address: ATLANTA, GA 30318	Mailing Address: 2301 CROSBY RD C/O GREG WOLD WAYZATA, MN 55391
--	--

Contact Person GREG WOLD
For Source (612) 742-6966
Information

Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date:
Accessibility: No. Employees: State District:

NAICS Codes: 325211 Plastics Material and Resin Manufacturing

Notes: V-D&E: THIS FACILITY IS OUT OF BUSINESS AND THE ONLY GENERATION OF HAZARDOUS WASTE RESULTED FROM CLEANING TANKS AND DISCARDING OF LAB PACKS AND OUT-OF-DATE CHEMICALS.

RCRA Site Detail

Report run on: November 16, 2007 - 10:33 AM

Page 4

GAD057288144 CARGILL INC.

Continued...

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator, State:

Transfer Facility: Unknown

Other Hazardous Waste Generator Activities

Importer Activity: Unknown
Mixed Waste Generator: Unknown

Transporter Activity: Unknown

TSD Activity: No

Recycler Activity: Unknown

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown
Smelting, melting, Refining Furnace Exemption: Unknown

Used Oil Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: Unknown

Transporter: Unknown
Transfer Facility: Unknown

Used Oil Fuel Marketer Activity

Marketer who directs shipment off-specification used oil to off-specification used oil burner: Unknown

Used Oil Processor and/or Re-refiner Activity

Processor: Unknown
Refiner: Unknown

Marketer who first claims the used oil meets the specifications: Unknown

Underground Injection Control: Unknown
Destination Facility for Universal Waste: Unknown

Biennial Report Information

Total Quantity Reported (Tons): Generated: 79 Managed: 0 Shipped: 78 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
-----------	---------	---------------------------	---------	----------------------------

WASTE FLAMMABLE LIQUID GENERATED FROM OUT-OF-DATE RAW MATERIALS NO LONGER USED DUE TO PLANT CLOSING	16	0	16	H050 ENERGY RECOVERY
---	----	---	----	----------------------

EPA Waste Codes: D001, U009, U162

CARBON WASTE GENERATED FROM VAPOR RECOVERY OF A CAUSTIC SCRUBBER UTILIZED TO CONTROL VAPORS FROM RAW MATERIAL STORAGE TANKS.

0	0	0
---	---	---

EPA Waste Codes: U162

CARBON WASTE GENERATED FROM VAPOR RECOVERY OF A ACRYLONITRILE STORAGE TANK

0	0	0
---	---	---

EPA Waste Codes: U009

Activity Location: GA Source Type: Biennial Report Seq. Number: 1 Receive Date: 27 FEB 1990 Report Cycle: 1989

Other/Previous Site Name: CARGILL INC

Location: 762 MARIETTA BLVD NW
Address: ATLANTA, GA 30318

Mailing Address: 762 MARIETTA BLVD NW
Address: ATLANTA, GA 30318

Contact Person: GREG WOLD
For Source Information: (404) 881-4300 ext. 0332

Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date:

Accessibility: No. Employees: State District:

NAICS Codes: 32551 Paint and Coating Manufacturing

RCRA Site Detail

Report run on: November 16, 2007 - 10:33 AM

Page 5

GAD057288144 CARGILL INC.

Continued...

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator, State:

Transfer Facility: Unknown

Used Oil Activities

Other Hazardous Waste Generator Activities

Used Oil Transporter Activity

Off-Specification Used Oil Burner:

Unknown

Importer Activity: Unknown

Transporter: Unknown

Used Oil Fuel Marketer Activity

Mixed Waste Generator: Unknown

Transfer Facility: Unknown

Marketer who directs shipment
off-specification used oil to
off-specification used oil burner:

Unknown

Transporter Activity: Unknown

Used Oil Processor and/or
Re-refiner Activity

TSD Activity: No

Processor: Unknown

Marketer who first claims the used
oil meets the specifications:

Unknown

Recycler Activity: Unknown

Refiner: Unknown

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown

Underground
Injection Control:

Unknown

Destination Facility for
Universal Waste:

Unknown

Smelting, melting, Refining Furnace

Exemption: Unknown

Biennial Report Information

Total Quantity Reported (Tons): Generated: 177 Managed: 0 Shipped: 157 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
28	0		28	H050 - ENERGY RECOVERY
EPA Waste Codes: U031, U220				
22	0		22	H050 - ENERGY RECOVERY
EPA Waste Codes: D002				
13	0		13	H050 - ENERGY RECOVERY
EPA Waste Codes: U031, U122				
2	0		2	H132 - LANDFILL OR SURFACE IMPOUNDMENT
EPA Waste Codes: U009				

Activity Location: GA Source Type: Part A Seq. Number: 1 Receive Date: 19 NOV 1980

Other/Previous Site Name: CARGILL INC.

Location 762 MARIETTA BLVD NW
Address: ATLANTA, GA 30318

Mailing Address: C/O HAZ LABS
2264 NW PKWY SUITE F
MARIETTA, GA 30067

Contact Person DANA SCHNEIDER 762 MARIETTA BLVD NW
For Source (404) 873-1851 ATLANTA, GA 30318
Information

Operator (current) 762 MARIETTA BLVD NW
AZS CORPORATION ATLANTA, GA 30318
From: To:

Type: Private
Phone: (404) 873-1851

Land Type: Private Non Notifier: No Commercial Availability: Other - U Tsd Date:

Accessibility: No. Employees: State District: GTT

NAICS Codes: 325613 Surface Active Agent Manufacturing

RCRA Site Detail

Report run on: November 16, 2007 - 10:33 AM

Page 6

GAD057288144 CARGILL INC.

Continued...

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State: HQ-N Not a Generator

Transfer Facility: Unknown

Other Hazardous Waste Generator Activities

Importer Activity: Unknown
Mixed Waste Generator: Unknown

Transporter Activity: No
TSD Activity: No
Recycler Activity: No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown
Smelting, melting, Refining Furnace Exemption: Unknown

Used Oil Activities

Used Oil Transporter Activity
Transporter: No
Transfer Facility: No

Off-Specification Used Oil Burner: No

Used Oil Fuel Marketer Activity
Marketer who directs shipment off-specification used oil to off-specification used oil burner: No

Used Oil Processor and/or Re-refiner Activity
Processor: No
Refiner: No

Marketer who first claims the used oil meets the specifications: No

Underground Injection Control: No

Destination Facility for Universal Waste:

Other Permits:

Number	Description	Owner	Type	Type Description
GA0000361		US	N	NPDES

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: U154, U159, U194

* End of Report *

Comprehensive Compliance Monitoring and Enforcement Report

Report run on: November 16, 2007 - 10:33 AM

Version: 3.0

User Selection Criteria

Location:	Georgia, all activities	Activity Location:	None Chosen
Handler ID:	GAD057288144	Group of IDs:	None Chosen
Handler Name:			
Handler Universe:	No Additional Restrictions		
Evaluation Date Range:	From Date: 10/01/1990 To Date: 11/16/2007	Extract Flag:	Include All Sites
Location County Code:		Evaluation Suborganization:	
Location City:		Evaluation Person:	
Location Zip Code:		Evaluation Focus Area:	
State District:		Federal Facilities:	No, Show All
		Only Eval's with Viol's:	No, All Evaluations
Evaluating Agencies:	None Chosen		
Evaluation Types:	None Chosen		
Violation Types:	None Chosen		
Sort Order:	Region, State, Handler Name		
Display Code Descrip.:	Yes		

Results

Data meeting the criteria you selected follows.

Total Pages: 4 Handler Count: 1

Report Description

This report provides a complete listing of evaluation, violation and enforcement activities for each Handler, including all orphan records. Below the Handler ID information, the data is presented in three sections; evaluations, violations and enforcements. Comments, referred to as Notes, are provided in each respective section. Since evaluations are included regardless of whether or not violations are identified, this report also serves as a useful management tool for tracking progress made towards meeting RECAP commitments.

Report Information

Name:	cmecomp.rdf
Developed by:	EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed Date:	November 2005
Last Updated:	April 2006
Contact:	rcrainfo.help@epa.gov
Tables Used:	cmecomp3, hreport_univ3, ccitation3, hhandler2, lu_state, hid_groups
Libraries:	none

Comprehensive Compliance Monitoring and Enforcement Report

Page 2

Report run on: November 16, 2007 - 10:33 AM

This report may contain enforcement sensitive data.

CARGILL INC.

County Name / Code: FULTON / GA121

GAD057288144

REGION 04

Location: 762 MARIETTA BLVD NW; ATLANTA, GA 30318

Mailing: C/O HAZ LABS; 2264 NW PKWY SUITE F; MARIETTA, GA 30067

Activity Location: GA	State District: GTT	Accessibility:	Non-Notifier:	Extract Flag: Y	Active Site: N
Generator: N	Transporter: N	Operating TSDF: ----	IC In Place: N	El Indicator (HE / GW): N / N	
Full Enforcement: ----	Converter: ----	State Unaddressed SNC: N	EPA Unaddressed SNC: N		
CA Wrkld: N	State TSDF: ----	State Addressed SNC: N	EPA Addressed SNC: N		
Active State Gen: N		State SNC w/Comp Sched: N	EPA SNC w/Comp Sched: N		

CEI Evaluation 03/20/1997	Activity Location: GA	By: STATE	Identifier: 001	Person: GAGTT	Suborganization: GC	Found Violation: YES
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area:	
Eval. Notes: - Former Eval Owner and Type: HQ CEI. Former Reason Owner and Code: GA 60						

Violation: Activity Location: GA	Type: 262.A	Determined Date: 03/28/1997	Determined by Agency: STATE	Responsible Agency: STATE
Scheduled Compliance Date: 04/28/1997		Actual Compliance Date: 07/18/1997	RTC Qualifier: OBSERVED	Sequence Number: 17

Former Citation - SR - 262.11

Viol. Notes: FACILITY FAILED TO PERFORM HAZARDOUS WASTE DETERMINATIONS

Enforcement: Activity Location: GA	Type: 120	Action Date: 03/28/1997	Identifier: 001
Docket:	Agency: STATE	Responsible Person: GAGTT	Branch: GC
CA Component: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:
Enf. Notes: 1 VIOLATION			

Total Number of Handlers: 1

Total Number of Activity Locations: 1

* End of Report *

Comprehensive Compliance Monitoring and Enforcement Report

Page 3

Report run on: November 16, 2007 - 10:33 AM

This report may contain enforcement sensitive data.

Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
EI Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

Comprehensive Compliance Monitoring and Enforcement Report

Page 4

Report run on: November 16, 2007 - 10:33 AM

This report may contain enforcement sensitive data.

Description of codes used on the report:

ACCESSIBILITY - indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator):	
Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority:	
Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	indicates that the handler is a former non-notifier
X	indicates that the handler is a non-notifier

BY	
By indicates the agency who performed the evaluation/inspection.	

FOUND VIOLATION - indicates whether or not the evaluation discovered a violation:	
Code	Description
Yes	indicates that the evaluation did find violations.
No	indicates that the evaluation did not find violations.
U	indicates that it is undetermined at this time. The agency may still be determining whether violations existed.

Evaluation Type	Description
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE

Violation Type	Description
262.A	GENERATORS - GENERAL

Enforcement Type	Description
120	WRITTEN INFORMAL

Comprehensive Corrective Action Report

Report run on: November 16, 2007 - 10:34 AM

Version: 3.0

User Selection Criteria

Location: National

Handler Name:

Handler ID: GAD057288144

Group of IDs: Not Chosen

County Code:

Results

Data meeting the criteria you selected follows.

Total Pages: 3

Total Handlers:1

Report Description

This report lists **ALL** corrective action data for all facilities that meet the selection criteria. Events not linked to authorities and areas -- considered "orphan" events or "one parent" events -- are displayed on this report. Areas and authorities not linked to events "orphans" are also displayed.

Report Information

Name: compca.rdf
Developed by: EPA Headquarters, Office of Solid Waste
Deployed: November 2002
Last Updated: January 2006
Contact: rcrainfo.help@epa.gov
Tables Used: hbasic, hreport_univ3, aevent, aarea, aca_authority, aln_area_event, aln_event_authority, lu_authority, lu_ca_event, lu_state, gpra_ca, hid_groups
Libraries: decodes.pll

Comprehensive Corrective Action Report

Page 2

Report run on: November 16, 2007 - 10:34 AM

List of Handler Universe Abbreviations

Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
El Indicator (HE/GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Perm Prgrs	Indicates that the facility is part of the Permitting/Closure/Post-Closure Progress universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
PermWrkld	Indicates that the facility is part of the Permit Workload universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
Clos Wrkld	Indicates that the facility is part of the Closure Workload universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
Pclos Wrkld	Indicates that the facility is part of the Post-Closure Workload universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
Permits GPRA 06	Indicates that the facility is part of the Permits GPRA 2006 universe. ('+' indicates that the facility is on the Permits GPRA 2006 Baseline and meeting the goal; '-' indicates that the facility is on the Permits GPRA 2006 Baseline and not meeting the goal; 'N' indicates that the facility is not on the Permits GPRA 2006 Baseline)
Renewals GPRA 06	Indicates that the facility is part of the Renewals GPRA 2006 universe. ('+' indicates that the facility is on the Renewals GPRA 2006 Baseline and meeting the goal; '-' indicates that the facility is on the Renewals GPRA 2006 Baseline and not meeting the goal; 'N' indicates that the facility is not on the Renewals GPRA 2006 Baseline)
Subj CA	Indicates that the facility is part of the Subject to Corrective Action universe. ('Y' indicates that the facility is in this universe).
Subj CA TSD 3004	Indicates that the facility is a Treatment, Storage or Disposal facility Potentially Subject to Corrective Action Under 3004(u)/(v). ('Y' indicates that the facility is in this universe).
Subj CA TSD Discr	Indicates that the facility is a Treatment, Storage or Disposal facility Subject to Corrective Action Under Discretionary Authorities. ('Y' indicates that the facility is in this universe).
Subj CA Non-TSD	Indicates that the facility is a Non-Treatment, Storage or Disposal facility where Corrective Action has been imposed. ('Y' indicates that the facility is in this universe).
CA Wrkld	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
CA GPRA 08	Indicates that the facility is part of the Corrective Action GPRA 2008 universe. ('Y' indicates that the facility is in this universe).

Comprehensive Corrective Action Report

Report run on: November 16, 2007 - 10:34 AM

CARGILL INC.		County Name / Code: FULTON / GA121				GAD057288144	
Location: 762 MARIETTA BLVD NW, ATLANTA, GA 30318		Region 04					
Mailing: C/O HAZ LABS, 2264 NW PKWY SUITE F, MARIETTA, GA 30067							
Activity Location: GA	State District: GTT	Non-Notifier:	Extract: Y	Active: N			
Generator: N	Transporter: N	Operating TSDF: ----	IC In Place: N	El Indicator (HE / GW): N / N			
Perm Prgrs: ----	Pclos Wrkld: ----	Subj CA: N	Subj CA Non-TSD: N	CA GPRA 08: N			
Perm Wrkld: ----	Permits GPRA 06: N	Subj CA TSD 3004: N	CA Wrkld: N				
Clos Wrkld: ----	Renewals GPRA 06: N	Subj CA TSD Discr: N					
CA Authority		Suborg	Staff	Attmy	Resp. Agcy	Loc	Issue Date
-- missing --							
Area Name	Seq	Releases: GW	SW	Soil	Air	Facilitywide	Y
ENTIRE FACILITY	1						
Event Code	Seq	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New	
CA075ME	1	State	GA	11/08/1991			
CA PRIORITIZATION-MEDIUM CA PRIORITY							
Area Name	Seq	Releases: GW	SW	Soil	Air	Facilitywide	
-- missing --							
Event Code	Seq	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New	
CA225NR	1	State	GA	09/30/1992			
STABILIZATION MEASURES EVALUATION-FACILITY NOT AMENABLE TO STABILIZATION							

* End of Report *



National Water-Quality Assessment Program

What fish live in the streams of Metropolitan Atlanta?

Why should I care about the fish living in my local stream?

Most residents of the Chattahoochee River basin in Metropolitan Atlanta live in one of 35 tributary basins to this river. Many of these tributaries are too small to support good fishing, are not generally accessible for recreation, and are not directly used for drinking water supply. However, as the Chattahoochee River flows through Metropolitan Atlanta, its water quality is affected by the water it receives from these tributaries.

As the population of the Chattahoochee River basin continues to grow, an increasing part of land is becoming urbanized. Streams that drain urban areas often have poor water quality resulting from contaminants in storm water and ground water, and have physical habitats degraded by sedimentation and stream bank erosion. Periodic sampling of water chemistry may not detect water-quality problems that occur infrequently, such as during storm runoff. Human induced changes in water quality or habitat can alter the number of individuals and species of fish present in streams. Because fish respond directly to the quality of water they inhabit, they are useful as indicators of the cumulative effects of water-quality problems that may not otherwise be detected. Although the small tributaries of the Chattahoochee River may not be important to people for fishing or recreation, the types of fish living in these streams provide an indication of the quality of water that flows into the Chattahoochee River.

In November 1993, personnel from the U.S. Geological Survey (USGS) surveyed fish in sections of nine tributaries of the Chattahoochee River Basin in Metropolitan Atlanta. The location of survey sites, basin boundaries, and the extent of urban area are shown in figure 1. Eight tributaries, Nickajack Creek, Rottenwood Creek, Sope Creek, Willeo Creek, Nancy Creek, Peachtree Creek, Proctor Creek, and Utoy Creek, receive runoff from urban areas such as subdivisions, office and industrial parks, shopping malls, airports, roads, and golf courses. In addition to these urban basins, Snake Creek was surveyed to provide a comparison of fish populations in a mostly forested basin.

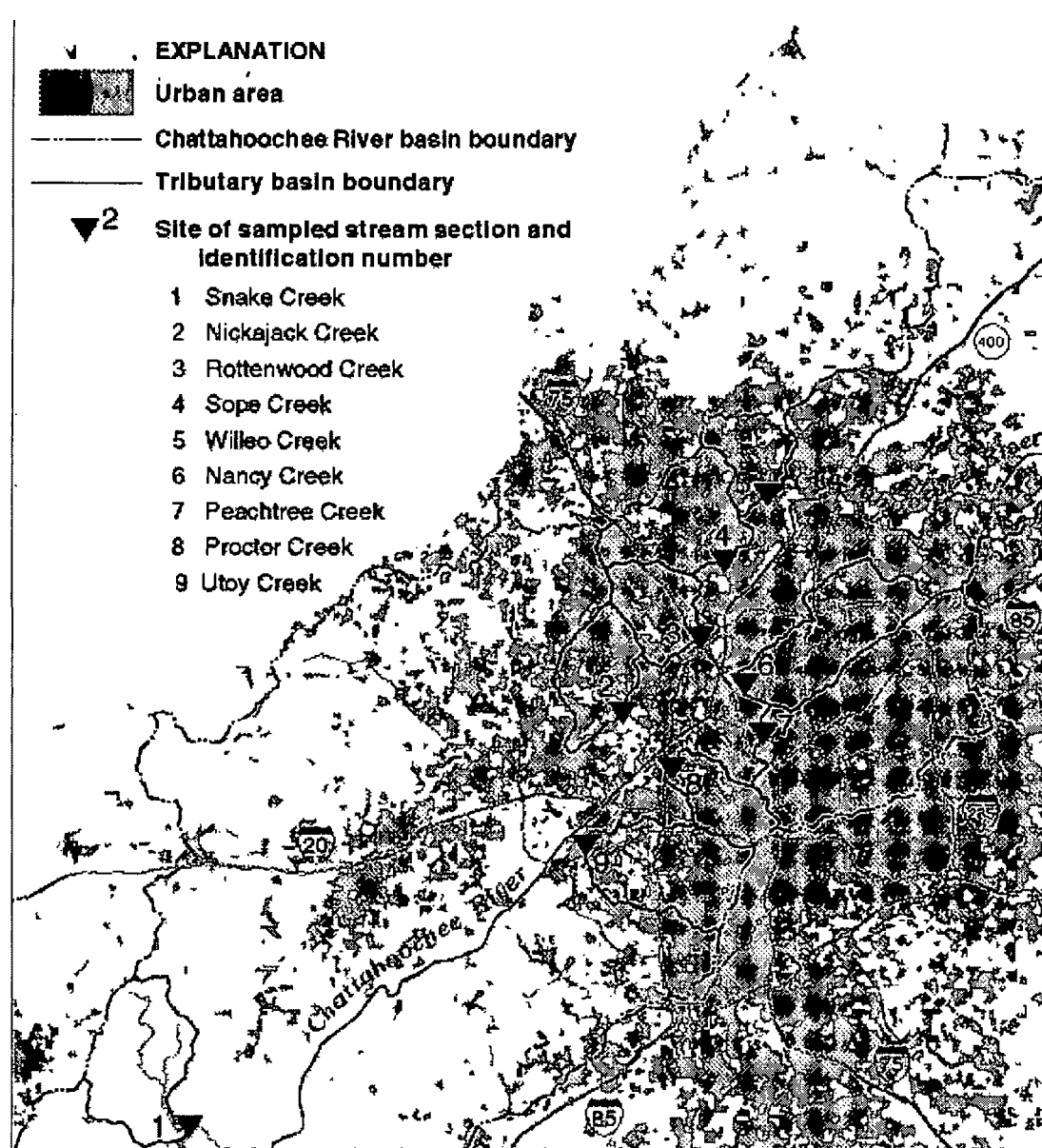


Figure 1. Location of stream sections surveyed and tributary boundaries in the Metropolitan Atlanta area. (Urban area from Atlanta Regional Commission, 1990.)

This report summarizes information from historic fish surveys, and describes the results of the November 1993 fish survey. The results indicate the changes in fish populations that may occur as forested and rural basins become urbanized. Colored parts of figure 1 show the extent of urban area in Metropolitan Atlanta in 1990. In contrast to the Snake Creek basin which is 83 percent forested, the other 8 basins range from 70 to more than 90 percent urban area (table 1). Although residences cover a large percentage of area in all urban basins, industrial, commercial, and transportation areas cover approximately one-fourth to one-third of the Rottenwood, Nancy, Peachtree, and Proctor Creek basins. These basins are among the older urban areas of Metropolitan Atlanta.

Table 1. Drainage areas and basin characteristics for tributaries upstream of locations surveyed for fish populations

Tributary	Drainage area (square miles)	Urban			Forest	Agriculture	Other
		Residential	Industrial, commercial, transportation	Other urban			
Snake Creek	36	1	0	0	83	15	1
Sage Creek	31	68	13	1	12	4	2
Nickajack Creek	21	63	11	1	20	3	2
Wilco Creek	15	68	1	14	20	6	14
Peachtree Creek	85	59	32	2	7	0	0
Nancy Creek	35	63	24	4	7	<1	<2
Proctor Creek	16	53	26	7	11	0	3
Rottenwood	18	39	33	15	12	<1	<1
Utoy Creek	34	52	12	6	26	<1	<4

¹from Atlanta Regional Commission (1990)

What fish were identified in historic surveys?

Fish species identified in historic surveys of the study area were compiled from museum records (table 2). Because many of these surveys were conducted before basins became urbanized, the records indicate fish species that were present when these basins were mostly rural. Forty-two native fish species have been found in tributaries of the Chattahoochee River in the study area. Native species are those that naturally occur in the basin. Although many of these species prefer small shallow tributaries, most also have been found in the Chattahoochee River. There are fish species in the Chattahoochee River that do not occur in tributaries. For example, trout inhabit the Chattahoochee River where they find the cool water necessary for their survival. This cool water originates as deep-water releases from Buford Dam at Lake Lanier north of Atlanta. The water temperatures of tributaries in Metropolitan Atlanta are too warm to support trout.

The group with the largest number of species is the minnow family. Minnows are small fish that can be seen darting around in streams that are only a few feet wide. Other families with large numbers of species are the sunfish and bass family, the catfish family, and the sucker family. Species that have the largest numbers of individuals living in streams typically are minnows and suckers. These species are often not well known because unlike sunfish, bass, and catfish, people do not fish for them, although certain minnows may be used as bait. Minnows have an important role in the aquatic food chain as prey for larger fish, aquatic snakes, turtles, and wading birds such as herons. Suckers can grow to more than one foot long and are named for their down-turned mouth that they use to "vacuum" food from stream bottoms. Although suckers are not popular game fish, they are ecologically important because they often account for the largest fish biomass in streams.

Three species are noteworthy because they are endemic: that is, they live exclusively in the Chattahoochee and Flint River basins. The endemic species are the bluestripe shiner, grayfin redhorse, and greater jumprock. Although many of the basin's native fish also naturally occur in other river basins, these three species are native only to the Chattahoochee and Flint River basins. In addition, the highscale shiner may also have been endemic. However, the highscale shiner has been found in one location in the Savannah River basin. The bluestripe shiner and highscale shiner are listed by the state of Georgia as threatened. In addition, the bluestripe shiner is a candidate for listing under the Federal Endangered Species Act.

In addition to the 42 native species, 8 non-native species have been introduced into the basin by man probably as game fish or released from bait buckets. The introduced, non-native species are the red shiner, white sucker, black bullhead, flat bullhead, spotted bass, smallmouth bass, green sunfish, and yellow perch. Species that survive outside of their native streams often can tolerate a wide range of water-quality and habitat conditions. Consequently, such hardy, non-native fish often thrive in streams where water quality or habitat has been degraded.

What fish were identified in the USGS survey?

A combination of backpack electro-fishing and seining was used to capture fish in sections of each stream at least 482 feet long (Meador and others, 1993a). Electrofishing is a technique which uses electricity to mildly stun fish that are then captured by net or seine. Standard survey methods were used in each stream section so that results among stream sections could be compared. Stream sections were chosen to represent typical conditions in each tributary.

The number of individual fish and species captured in the 9 streams are shown in table 3 ([html](#)) ([gif](#)). The streams are presented, from left to right, in descending order of the number of native species captured. The largest number of native species and individuals (with the exception of Peachtree Creek) was found in Snake Creek, the basin mostly covered by forest. One of the 3 endemic species, the grayfin redhorse, was found in

Table 3. Number of fish collected in each stream section by the USGS in
November, 1993

Common name of fish species	Number of fish (---, none found)								
	Snake Creek	Sope Creek	Nicka- jack Creek	Willeo Creek	Nancy Creek	Peach- tree Creek	Rotten- wood Creek	Proctor Creek	Utoy Creek
golden shiner	---	---	---	---	---	2	---	---	---
creek chub	4	9	4	---	7	---	---	---	---
bluehead chub	21	9	20	12	---	1	---	---	---
bluefin stoneroller	89	16	59	---	---	1	---	---	---
bandfin shiner	169	47	10	2	---	---	---	---	---
red shiner	---	---	39	---	58	479	3	191	---
yellowfin shiner	---	48	---	21	---	---	---	---	---
longnose shiner	26	9	---	4	---	---	---	---	---
silverjaw shiner	---	---	14	---	6	1	---	---	---
white sucker	---	2	---	---	1	1	8	11	---
spotted sucker	6	---	---	---	---	---	---	---	---
Alabama hog sucker	71	28	28	71	3	---	1	---	---
grayfin redhorse	53	---	---	---	---	---	---	---	---
channel catfish	---	---	---	---	---	1	---	---	---
yellow bullhead	1	1	2	---	---	---	---	---	1
black bullhead	---	---	---	---	---	1	---	---	---
crown bullhead	---	---	4	---	---	7	---	---	---
snail bullhead	17	1	1	---	3	---	---	---	---
flat bullhead	2	3	---	---	22	---	---	---	---
bande sculpin	---	---	---	---	---	---	---	---	---
southern studfish	---	1	---	6	---	---	---	---	---
mosquitofish	---	---	---	---	4	1143	3	---	---
shadow bass	---	---	---	---	1	---	---	---	---
largemouth bass	2	3	---	2	2	---	---	1	---
reder bass	7	---	---	---	---	---	---	---	---
smallmouth bass	---	---	2	---	---	---	---	---	---
warmouth	2	5	1	1	1	2	1	---	---
gulf sunfish	---	1	7	1	2	26	27	3	2
bluegill	27	80	37	117	30	7	24	---	2
reder sunfish	---	---	---	17	---	---	---	---	---
redbreast sunfish	48	20	21	20	78	31	13	18	---
bluegill x redbreast hybrid	---	---	---	---	---	37	---	---	---
blackbanded darter	96	24	33	11	2	---	---	---	---
Total native species	16	15	13	12	11	11	5	2	2
Total species	17	18	16	13	15	15	8	5	3
Total individuals	641	307	282	285	220	1740	80	224	5
Percent non-native individuals	<1	2	17	<1	38	29	47	91	40

[Back to the text of "What fish live in the streams of Metropolitan Atlanta?"](#)

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Table 2. Fish species inhabiting tributaries to the Chattahoochee River in the study area. Compiled from museum records maintained by the University of Georgia Museum of Natural History

Scientific name	Common name
Ichthyomyzontidae	lampreys
<i>Ichthyomyzon gagei</i>	southern brook lamprey
Esocidae	pike
<i>Esox americanus</i>	redfin pickerel
<i>Esox niger</i>	chain pickerel
Cyprinidae	minnow
<i>Notemigonus crysoleucas</i>	golden shiner
<i>Semotilus atromaculatus</i>	creek chub
<i>Semotilus thoreauianus</i>	dixie chub
<i>Nocomis leptcephalus</i>	bluehead chub
<i>Camptostoma pauciradii</i>	bluefin stoneroller
<i>Luxilus zonistius</i>	bandfin shiner
<i>Cyprinella venusta cercostigma</i>	blacktail shiner
<i>Cyprinella lutrensis</i> 2	red shiner
<i>Cyprinella callitaenia</i> 1	bluestripe shiner
<i>Notropis lutipinnis</i>	yellowfin shiner
<i>Notropis longirostris</i>	longnose shiner
<i>Notropis hypsilepsis</i>	highscale shiner
<i>Hybopsis sp. cf. winchelli</i>	clear chub
<i>Ericymba buccata</i>	silverjaw minnow
Catostomidae	suckers
<i>Catostomus commersoni</i> 2	white sucker
<i>Minytrema melanops</i>	spotted sucker
<i>Hypentelium etowanum</i>	Alabama hog sucker
<i>Moxostoma sp. cf. poecilurum</i> 1	grayfin redhorse
<i>Scartomyzon rupiscartes</i>	striped jumprock
<i>Scartomyzon lachneri</i> 1	greater jumprock
Ictaluridae	catfish
<i>Ictalurus punctatus</i>	channel catfish
<i>Ameiurus natalis</i>	yellow bullhead
<i>Ameiurus melas</i> 2	black bullhead
<i>Ameiurus nebulosus</i>	brown bullhead
<i>Ameiurus brunneus</i>	snail bullhead
<i>Ameiurus platycephalus</i> 2	flat bullhead
<i>Noturus gyrinus</i>	tadpole madtom
<i>Noturus leptacanthus</i>	speckled madtom
<i>Noturus funebris</i>	black madtom
Cottidae	sculpin
<i>Cottus carolinae</i>	banded sculpin
<i>Cottus bairdi</i>	mottled sculpin
Fundulidae	topminnows
<i>Fundulus stellifer</i>	southern studfish
Poeciliidae	livebearers
<i>Gambusia affinis holbrooki</i>	mosquitofish
Centrarchidae	basses and sunfish
<i>Pomoxis nigromaculatus</i>	black crappie
<i>Ambloplites ariommus</i>	shadow bass
<i>Micropterus salmoides</i>	largemouth bass
<i>Micropterus punctulatus</i> 2	spotted bass
<i>Micropterus coosae</i>	redeye bass
<i>Micropterus sp. cf. coosae</i>	shoal bass
<i>Micropterus dolomieu</i> 2	smallmouth bass
<i>Lepomis gulosus</i>	warmouth
<i>Lepomis cyanellus</i> 2	green sunfish
<i>Lepomis macrochirus</i>	bluegill
<i>Lepomis microlophus</i>	redear sunfish
<i>Lepomis auitus</i>	redbreast sunfish

Percidae

Perca flavescens 2
Percina nigrofasciata

perches and darters

yellow perch
blackbanded darter

1 endemic species, 2 non-native species

[Back](#) to the text of "What fish live in the streams of Metropolitan Atlanta?"

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Snake Creek. Although the 8 urban streams vary from 2 to 15 in the number of native species found, they share several characteristics in their fish populations: Generally, less than 50 percent of the number of fish found in Snake Creek were found in the urban streams, and up to 91 percent of the fish in urban streams were from non-native species. Native minnow and sucker species were almost completely absent in Nancy, Peachtree, Rottenwood, Proctor, and Utoy Creeks. These 5 creeks differ from Sope, Nickajack, and Willeo Creeks in the amount or proximity of industrial, commercial, and transportation areas (table 1). Although Utoy Creek has a lower percentage of area in this category, an industrial park is located immediately upstream of the sampling location.

A large number of mosquitofish found in Peachtree Creek may indicate poor water quality. Similar to the non-native red shiner, white sucker and green sunfish species, mosquitofish are tolerant of a wide range of water-quality conditions. After mishaps, such as chemical or sewerage spills which decrease fish populations, mosquitofish can repopulate a stream rapidly. They have short life cycles, and unlike other fish species listed in table 2, they bear their young live rather than lay eggs.

Why is physical habitat important?

The types of fish that may be found in the stream flowing through your neighborhood depends not only on the quality of the water, but also on the types of physical habitat present. Every successful fisherman knows to cast in areas where fish prefer to live, and that fish species differ in their preferred habitats. For example, the redeye bass prefers to live in swift water in steep-gradient streams with exposed bedrock. In contrast, the madpole madtom prefers quieter water flowing over mud, leaves, and other plant material. Even in streams with good water quality, certain species may be absent in sections that do not contain their preferred habitat. Not all 50 species of fish occurring in the study area will be found in every section of stream.

Stream habitats can be compared by estimating the amount of stream bottom that is covered by different materials (Meador and others, 1993b). The percentage of each stream section covered by the major types of bottom materials is shown in figure 2. These materials differ in their importance to fish as habitat. Most fish live near larger bottom materials such as gravel, cobble, and boulders. These larger materials provide spaces where food organisms such as aquatic insects live. Many fish spawn their eggs in nests constructed from gravel, or in holes and cracks in boulders and bedrock. Other important habitats that provide food and hiding places are aquatic plants, fallen logs, and accumulations of sticks and leaves.

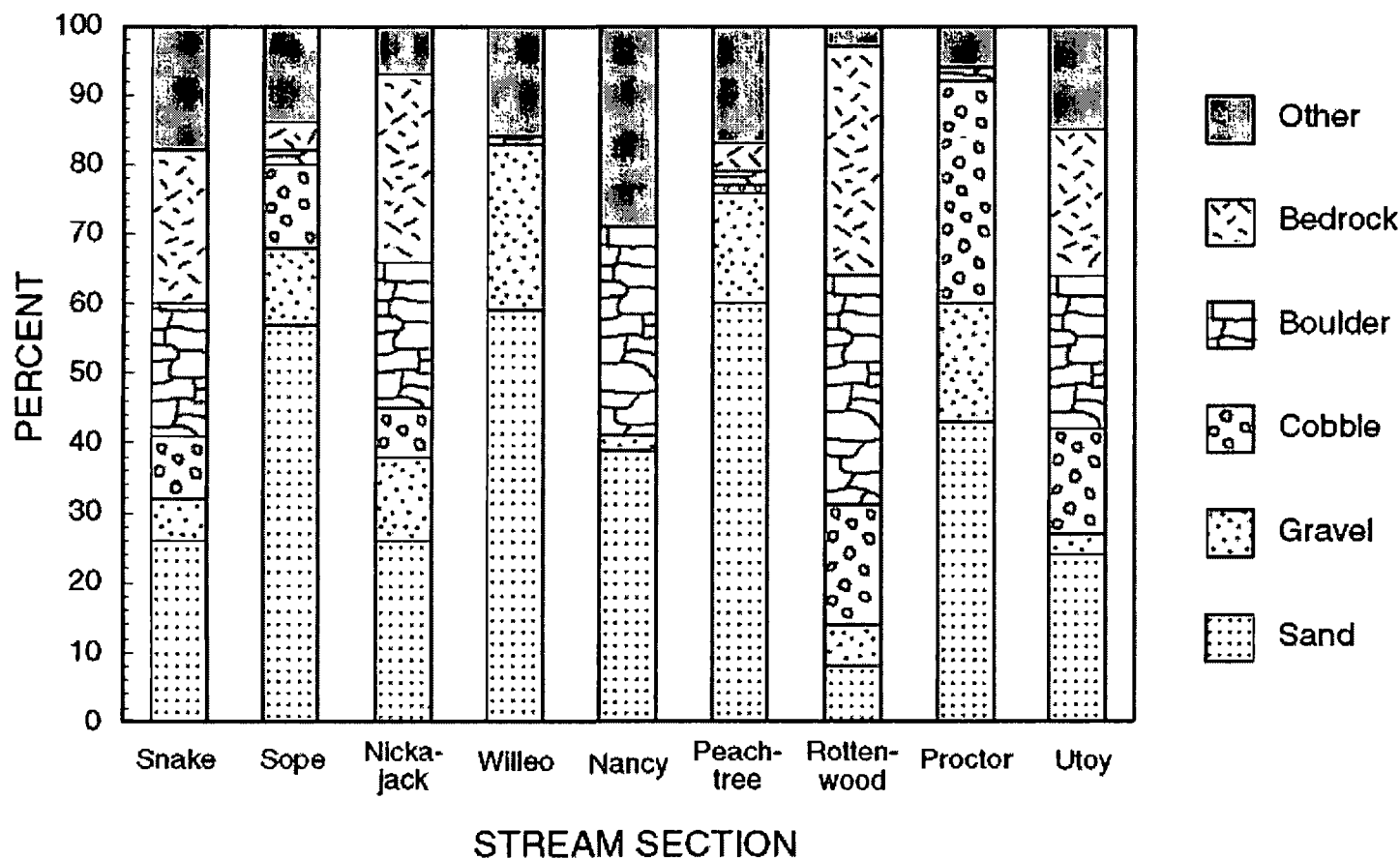


Figure 2. The percentage of stream bottom covered by different materials in each stream section. The percentage of materials such as logs, roots, mud, silt, or old tires are included in the "other" category. (See fig. 1 for stream-section location.)

Sand is a natural part of the stream bottom; however, in basins without effective erosion control, sand often covers a large part of the stream bottom burying or filling the spaces between gravel and cobble. As a consequence, the abundance of food organisms and spawning areas required by fish are decreased. The bluesripe and highscale shiner are threatened because their spawning sites among clean boulders and bedrock are increasingly buried by sand and silt.

Differences in fish populations among streams may be caused by factors other than habitat. For example, Rottenwood and Utoy Creeks, which have poor fish populations, both have a large percentage of their stream bottoms covered by gravel, cobbles, and boulders that provide good habitat (fig. 2). In comparison, although poor sand habitat covers greater than 50 percent of the stream bottoms in Sope and Willeo Creeks, they support a larger number of species than Rottenwood or Utoy Creeks. All urban streams, regardless of the quality of their physical habitat, were determined to have fish populations with fewer native species, and generally less than one-half the number of fish found in the forested stream.

The USGS National Water-Quality Assessment Program is measuring water chemistry and contaminants in stream water, bottom material, and organisms to better understand water quality in these urban basins. Such information will help us to understand factors that contribute to the differences in fish populations among these streams, and ultimately to protect the water quality of the Chattahoochee River.

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Meador, M.R., Hupp, C.R., Cuffney, T.F., and Gurtz, M.E. 1993b, *Methods for characterizing stream habitat as part of the National Water-Quality Assessment Program*, U.S. Geological Survey Open-File Report 93-408, 48 p.

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Fecal-coliform bacteria concentrations in streams of the Chattahoochee River National Recreation Area, Metropolitan Atlanta, Georgia, May–October 1994 and 1995

By M. Brian Gregory and Elizabeth A. Frick, U.S. Geological Survey

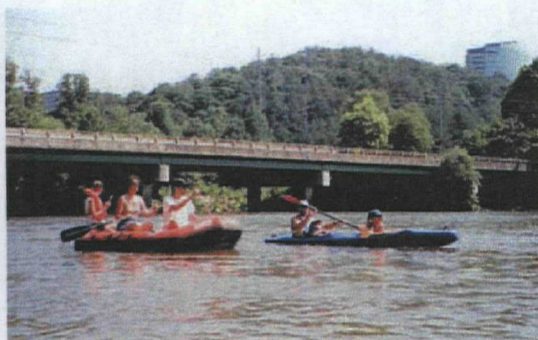
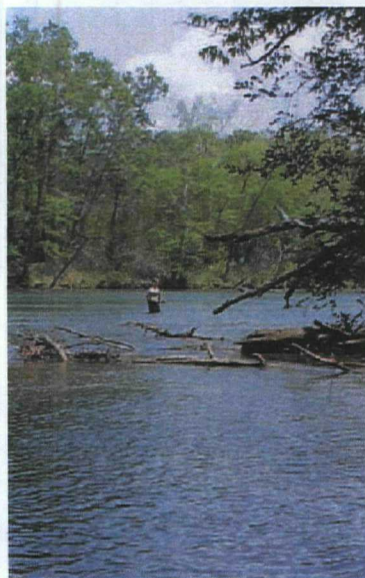
Significant Findings

- Fecal-coliform bacteria concentrations in the Chattahoochee River were low downstream from Buford Dam, especially nearest the dam, because of dilution from water released from near the bottom of Lake Sidney Lanier.
- Median fecal-coliform bacteria concentrations in the Chattahoochee River increased steadily from less than 20 Most Probable Number of colonies per 100 milliliters (MPN col/100 mL) in the tailwaters of Buford Dam on Lake Sidney Lanier to 790 MPN col/100 mL downstream of Metropolitan Atlanta. During the 1994 and 1995 summer recreation seasons, from 1 to 65 percent of samples collected at 14

Chattahoochee River monitoring sites exceeded the U.S. Environmental Protection Agency (USEPA) review criterion of 400 col/100 mL.

- Georgia Environmental Protection Division standards and the USEPA review criterion for fecal coliform bacteria were commonly exceeded during wet-weather conditions in most Metropolitan Atlanta tributary streams and during most streamflow conditions in several tributaries that drain areas dominated by urban and suburban land uses. During the 1994 and 1995 summer recreational season, from 27 to 100 percent of samples collected at 22 tributary stream-monitoring sites exceeded the USEPA review criterion of 400 col/100 mL.

- Statistically significant positive correlations were found between high fecal-coliform bacteria concentrations and increased discharges and high turbidities in less-developed tributary watersheds dominated by nonpoint sources such as runoff from parking lots, lawns, and pastures.
- In some highly urbanized tributary watersheds, there was an inverse correlation between high fecal-coliform bacteria concentrations and increased discharges and high turbidities, which indicates possible contamination from point sources such as leaking or overflowing sewer lines or discharge from combined sewer overflows.



The Chattahoochee River National Recreation Area (CRNRA) attracted approximately 2.9 million visitors in 1999 with nearly 30 percent of the visitors participating in water-based activities such as fishing and boating (William J. Carroll, National Park Service, oral commun., 2000). The CRNRA contains about three-fourths of all public green space in a 10-county area of Metropolitan Atlanta (Kunkle and Vana-Miller, 2000).


Introduction


The Metropolitan Atlanta area has been undergoing a period of rapid growth and development. The population in the 10-county metropolitan area almost doubled from about 1.5 million people in 1970 to 2.9 million people in 1995 (Atlanta Regional Commission, written commun., 2000). Residential, commercial, and other urban land uses more than tripled during the same period (Frick and others, 1998). The Chattahoochee River is the most utilized water resource in Georgia. The rapid growth of Metropolitan Atlanta and its location downstream of the headwaters of the drainage basin make the Chattahoochee River a vital resource for drinking-water supplies, recreational opportunities, and wastewater assimilation. In 1978, the U.S. Congress declared the natural, scenic, recreation, and other values


EXPLANATION


 **Chattahoochee River National Recreation Area**


Designated uses for the Chattahoochee River


 Drinking water and recreation

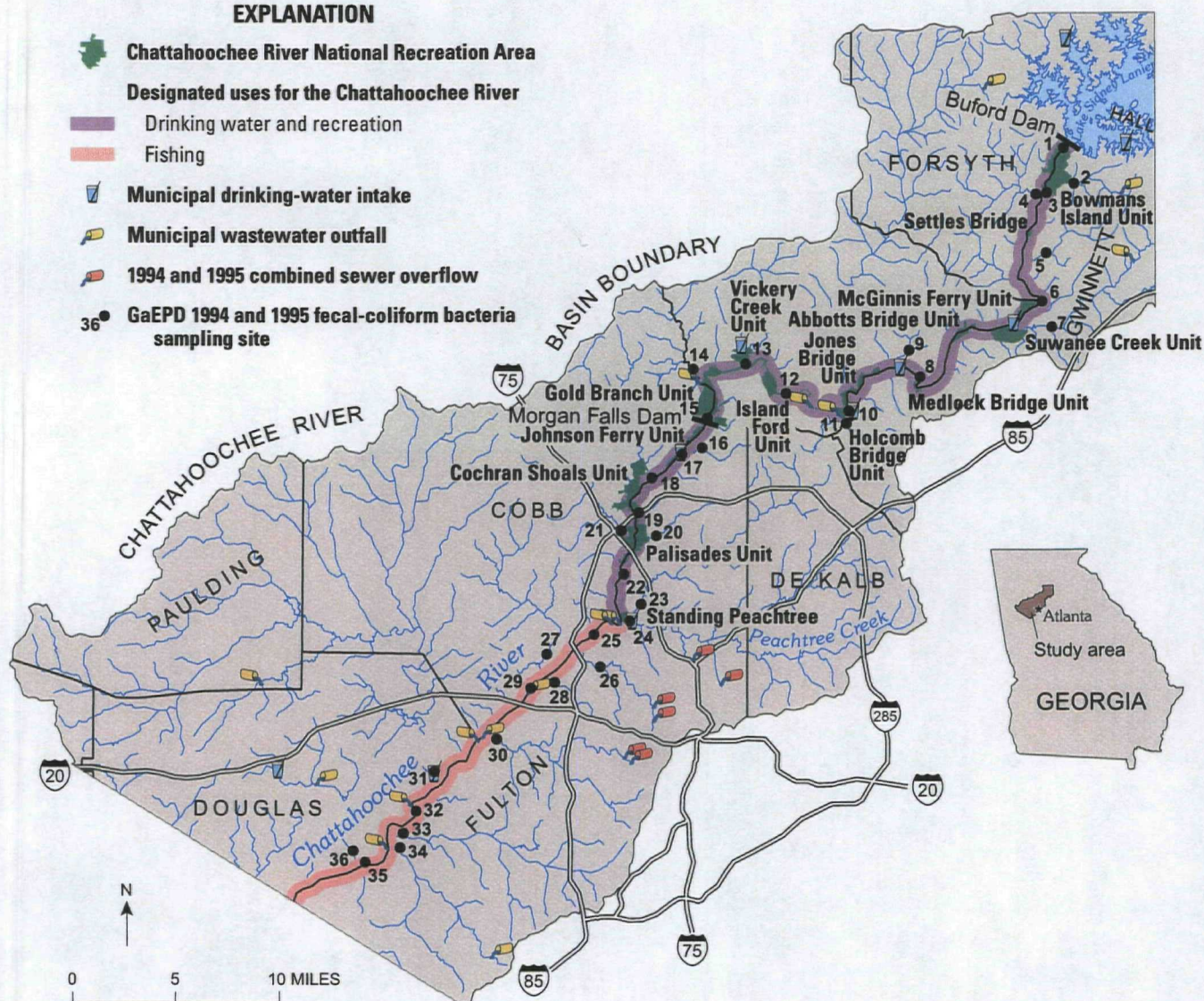
 Fishing

 Municipal drinking-water intake

 Municipal wastewater outfall

 1994 and 1995 combined sewer overflow

 GaEPD 1994 and 1995 fecal-coliform bacteria sampling site



Georgia Environmental Protection Division (GaEPD) 1994 and 1995 fecal-coliform bacteria sampling sites within the study area

Site number	Site name	Site number	Site name
1	Chattahoochee River—Buford Dam tailwater near Buford	19	Chattahoochee River—Powers Ferry Road & I-285 near Atlanta
2	Richland Creek	20	Long Island Creek
3	Chattahoochee River—State Road 20 near Suwanee	21	Rottenwood Creek
4	James Creek	22	Chattahoochee River—Paces Ferry Road at Atlanta
5	Level Creek	23	Nancy Creek
6	Chattahoochee River—McGinnis Ferry Road at Suwanee	24	Peachtree Creek
7	Suwanee Creek	25	Chattahoochee River—South Cobb Drive near Atlanta
8	Chattahoochee River—Medlock Bridge Road near Norcross	26	Proctor Creek
9	Johns Creek	27	Nickajack Creek
10	Chattahoochee River—Holcomb Bridge Road near Norcross	28	Sandy Creek
11	Crooked Creek	29	Chattahoochee River—Martin Luther King Jr. Blvd. near Mabelton
12	Chattahoochee River—Eves Road above Roswell	30	Utoy Creek
13	Big Creek	31	Sweetwater Creek
14	Willeo Creek	32	Chattahoochee River—State Road 166 near Ben Hill
15	Chattahoochee River—Morgan Falls Dam Forebay at Sandy Springs	33	Camp Creek
16	Marsh Creek	34	Deep Creek
17	Chattahoochee River—Johnson Ferry Road near Atlanta	35	Chattahoochee River—State Road 92 near Fairburn
18	Sope Creek	36	Anneewakee Creek

Figure 1. Location of the Chattahoochee River National Recreation Area and Georgia Environmental Protection Division fecal-coliform bacteria sampling sites in the study area, May–October 1994 and 1995.

of 48 miles of the Chattahoochee River from Buford Dam to Peachtree Creek to be of special national significance. To preserve this reach of the Chattahoochee River, the U.S. Congress created the Chattahoochee River National Recreational Area (CRNRA), which includes the Chattahoochee River downstream from Buford Dam to the mouth of Peachtree Creek and a series of park areas adjacent to the river in northern Metropolitan Atlanta (fig. 1).

Even with this protection, waters of the Chattahoochee River and many of its tributaries in Metropolitan Atlanta did not meet water-quality standards set for designated uses during 1994 and 1995 (fig. 1 and table 1). Much of the degradation of water quality has been associated with areas undergoing rapid urban growth and sprawling suburban development. The resulting conversion of mostly forested land to urban land has multiple adverse effects on water quality. Degradation of water quality may be caused by a number of factors including an increase in nutrient concentrations, sediment and sediment-bound contaminant concentrations (e.g., metals and pesticides) (Frick and others, 1998), and fecal-coliform bacteria concentrations (Center for Watershed Protection, 1999). The presence of fecal-coliform bacteria in streams and rivers indicates that contamination by fecal material from human or animal sources has occurred and contact with these waters can result in exposure to pathogenic bacteria often associated with fecal contamination.

During 1994 and 1995, elevated concentrations of fecal-coliform bacteria were the most common reason that the Chattahoochee River and tributaries did not meet their designated uses of drinking-water supply, recreation, and fishing. According to the Georgia Department of Natural Resources (1997), during 1994 and 1995, 67 of 77 stream reaches assessed in Metropolitan Atlanta did not meet or only partially met water-quality requirements for designated uses. Excessive concentrations of fecal-coliform bacteria were a contributing factor in 63 of the 67 streams that did not meet or only partially met designated uses. High concentrations of fecal-coliform bacteria have the potential to reduce the recreational value of the river and pose a continued threat, with unknown health risks, to humans that come in contact with the water while fishing, boating, rafting, wading, and swimming.

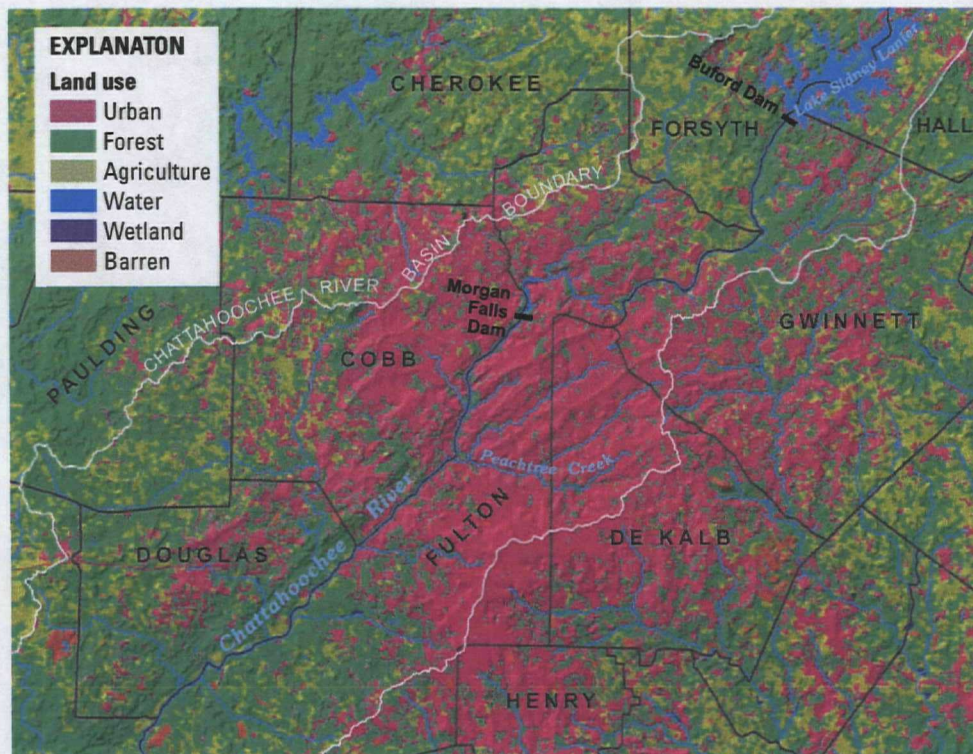


Figure 2. Land use, Metropolitan Atlanta area, 1995 (data from U.S. Geological Survey, 1977–80; U.S. Bureau of the Census, 1991; Atlanta Regional Commission, digital data, 1995; <http://www.census.gov/population/www/estimates/countypop.html>, 1996).

Project Description

In 1999, the U.S. Geological Survey (USGS) and the National Park Service (NPS) initiated a 2-year project designed to better define microbial contamination in and near the CRNRA, in Metropolitan Atlanta, Ga. As part of the USGS and NPS microbial project, a retrospective analysis of a spatially extensive water-quality data set for the upper Chattahoochee River was analyzed. These data were collected by the Georgia Environmental Protection Division (GaEPD) from May to October in 1994 and 1995 as part of their Chattahoochee River Modeling Project (Georgia Department of Natural Resources, 1994a). These data were collected from 18 mainstem sampling sites and 35 tributary sampling sites located along a 113-mile reach of the Chattahoochee River downstream from Buford Dam. GaEPD water-quality samples consisted of single grab samples collected from the middle of the stream. Fecal-coliform bacteria concentrations were determined using the Multiple Tube Fermentation Technique (American Public Health Association and others, 1985) and expressed as the Most Probable Number of fecal-coliform colony forming units per

100 milliliters (MPN col/100 mL). This report describes the distribution and occurrence of fecal-coliform bacteria concentrations based on GaEPD data collected at 14 Chattahoochee River and 22 tributary stream sites in the vicinity of the CRNRA and the reach of the Chattahoochee River immediately downstream of the CRNRA directly influenced by Metropolitan Atlanta (figs. 1 and 2).

Distribution of Fecal-Coliform Bacteria

From May to October of 1994 and 1995, fecal-coliform bacteria concentrations in many streams in the study area commonly exceeded GaEPD standards and maximum concentrations recommended for the designated uses of drinking water, recreation, and fishing. During the 1994 and 1995 summer recreational seasons, 1 to 65 percent of samples collected from 14 Chattahoochee River sites and 27 to 100 percent of samples collected from 22 tributary stream sites exceeded the U.S. Environmental Protection Agency (USEPA) review criterion of 400 col/100 mL (U.S. Environmental Protection Agency, 1997).

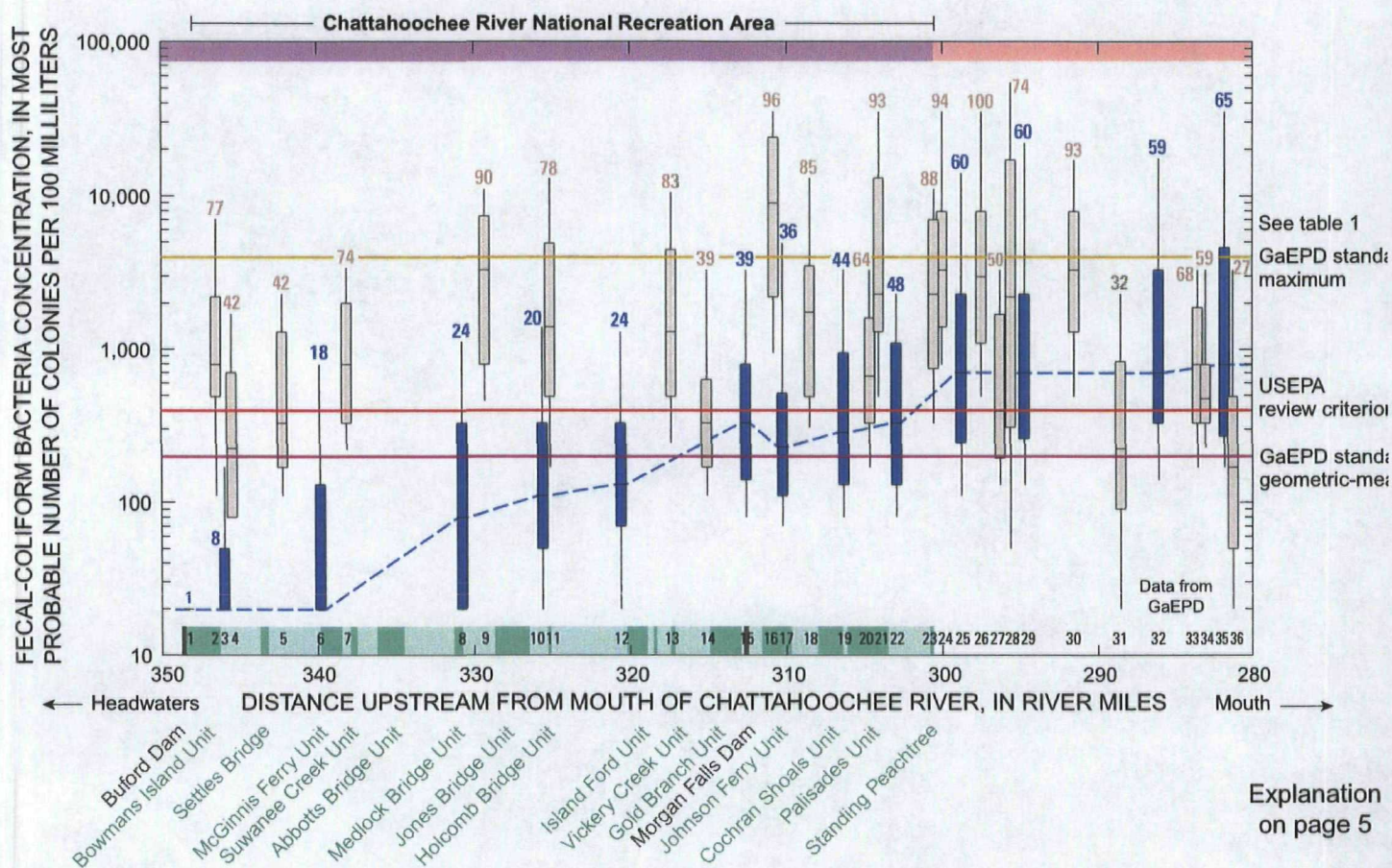


Figure 3. Fecal-coliform bacteria concentrations in the Chattahoochee River and tributary streams, Metropolitan Atlanta, May–October 1994 and 1995.

Table 1. Georgia Environmental Protection Division (GaEPD) fecal-coliform bacteria standards and U.S. Environmental Protection Agency (USEPA) review criterion

[All standards and criterion are in Most Probable Number of colonies per 100 milliliters (MPN col/100 mL); —, no standard or criterion. Modified from Georgia Department of Natural Resources, 1994b]

Designated use	Time of year that standards and criterion apply	GaEPD standards		USEPA (1997) recommended review criterion to evaluate once-per-month samples ²
		30-day geometric mean ¹	Maximum single sample ²	
Drinking-water supply	May–October ³	200	—	400
	November–April	1,000	4,000	—
Recreation	Year round	200	—	400
Fishing	May–October ³	200	—	400
	November–April	1,000	4,000	—

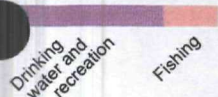
^{1/} Based on at least four samples collected from a given site over a 30-day period at an interval not less than 24 hours. The geometric mean of a series of N terms is the Nth root of their product. For example, the geometric mean of 2 and 18 is 6—the square root of 36.

^{2/} Waters are deemed **not supporting** designated uses (impaired) when 25 percent or more of the samples have fecal-coliform bacteria concentrations greater than the applicable review criterion or standard (400 or 4,000 MPN col/100 mL) and **partially supporting** when 11 to 25 percent of the samples exceed the review criterion or standard.

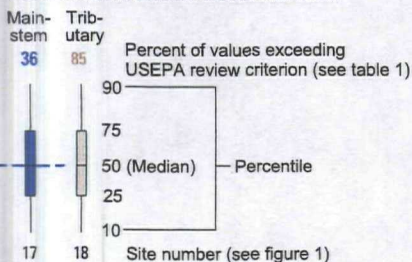
^{3/} May–October is defined as the summer recreation season—the season when most water-contact activities are expected to occur. The State of Georgia does not encourage swimming in any natural surface waters because a number of factors beyond the control of any State agency contribute to elevated concentrations of fecal-coliform bacteria.

EXPLANATION

Designated uses for Chattahoochee River



Fecal-coliform bacteria concentration



Chattahoochee River National Recreation Area



In tributary streams of the Chattahoochee River, fecal-coliform bacteria concentrations generally are higher than concentrations in the Chattahoochee River. Tributary streams having the lowest median fecal-coliform bacteria concentrations drained the least-developed areas, generally upstream and downstream from Metropolitan Atlanta, whereas tributary streams having the highest median fecal-coliform bacteria concentrations drained densely developed urban and suburban areas (fig. 3). For example, in Sope Creek,

a 35-square-mile watershed in which urban and suburban areas account for 81 percent of land use in the basin (fig. 2), only a few fecal-coliform bacteria concentrations from samples collected during low-flow periods were less than the USEPA review criterion of 400 col/100 mL. During this same period, the geometric-mean fecal-coliform bacteria concentrations was never less than the level considered safe based on the GaEPD fecal-coliform bacteria standards (fig. 4).

Why are fecal-coliform bacteria monitored and how do concentrations relate to water-borne diseases?

Testing for individual disease-causing agents is possible and is often done when there is a known or suspected outbreak of a water-borne disease. However, it is cost prohibitive, and in some cases technically impractical, to routinely monitor for all disease-causing bacteria, viruses, and protozoa that may be found in contaminated surface water. For routine water-quality monitoring, harmless bacteria that occur in higher numbers and originate from the same sources as the disease-causing bacteria are typically measured. The fecal-coliform bacteria group has long been the preferred indicator bacteria for Federal and State regulatory agencies and until 1986, was the primary indicator bacteria for which Federal and State regulations were based. Recent advances in the use of indicator bacteria have shown that *Escherichia coli* (*E. coli*) and Enterococci are more reliable for predicting the presence of disease-causing organisms and are now recommended for use in monitoring programs by the USEPA. Although the presence of indicator bacteria does not prove that pathogenic bacteria are present in the environment, the presence does show that contamination by fecal material has occurred. High concentrations of microbial indicators and concentrations that exceed standards pose an increased risk of exposure to harmful bacteria and the associated adverse effects.

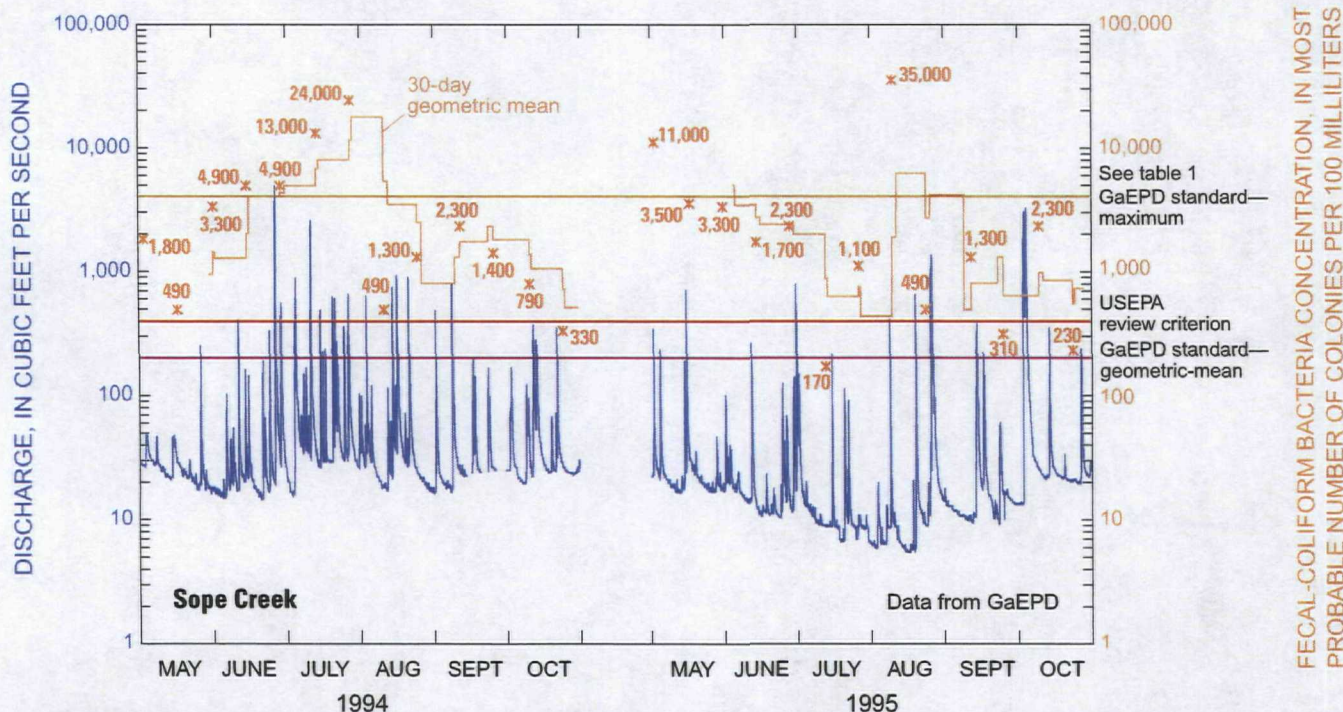


Figure 4. Stream discharge and fecal-coliform bacteria concentrations in Sope Creek, May–October 1994 and 1995. Concentrations of fecal-coliform bacteria in individual samples are denoted by an asterisk.



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305(b) Lists/Assessment Unit Information Year 2002

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Congress, 2002 Reporting
Cycle](#)

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Assessment
Database](#) (Fact Sheet)

[Previous National Water
Quality Reports](#)

[Enviromapper for Water](#)

Other Water Assessment Information

The most current report available for this assessment unit is 2002. Data are also available for these years: [2004](#)

Cycle: 2002

State: GA

Assessment Unit ID: GAR031300020103 **Water Name:** Proctor Creek

EPA Water Type: STREAM/CREEK/RIVER **Water Size:** 9 MILES

Water Quality Attainments

Designated Use Category	State Designated Use	Attainment Status	Threatened
Aquatic Life Harvesting	FISHING	NOT ATTAINABLE	No

<input type="checkbox"/>	Fully Supported	<input type="checkbox"/>	Threatened	<input type="checkbox"/>	Partially Supported	<input type="checkbox"/>	Not Supported	<input type="checkbox"/>	Not Assessed	<input type="checkbox"/>	Insufficient Information
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Note: State Designated Uses reported as "Not Attainable" are no longer recognized under the [2002 Integrated Report Guidance](#) and in this web report are categorized as "Not Supported".

Causes of Impairment

State Impairment	EPA Impairment Classification
TOTAL FECAL COLIFORM	PATHOGENS

Probable Sources Contributing to Impairment

The sources listed below may contribute to one or more of the above-listed impairments.

State Source	EPA Source Classification
COMBINED SEWER OVERFLOWS	SEWAGE
URBAN RUNOFF/URBAN EFFECTS	URBAN-RELATED RUNOFF/STORMWATER

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Last updated on Monday, November 19th, 2007
URL: http://iaspub.epa.gov/tmdl/enviro_v2.wcontrol

: Available Now in NWISWeb

USGS Surface-Water Annual Statistics for Georgia

Times for Georgia stations are shown as Eastern Standard Time. If your clock is set to Eastern Daylight Savings Time, add one hour to the time shown on the Web page to compare to your clock time.

Additional information may be found on the [USGS Water Resources of Georgia](#) page, including [low-flow statistics](#) and [flood-frequency information](#) for selected stations.

NEW! If you would like to stay informed about USGS activities in Georgia, including publication releases, gage shutdown notifications, and other general USGS news, sign up for [Georgia Water Science Center E-mail Notices](#).

Site Selection

Select sites which meet all of the following criteria: ---- or select [new criteria](#)

Initial Site Selection Results -- 3 sites match criteria

Parameter codes = 00060

Site name contains string = Proctor

Site type = Surface Water

County = Fulton

Check one or more boxes to select sites for further display--below

USGS 02336517 PROCTOR CREEK AT HORTENSE WAY, AT ATLANTA, GA

	Parameter Code	Parameter Name	Period of Approved Daily-Mean Data (Water Year)		
			From	To	count
<input type="checkbox"/>	00060	Discharge, cubic feet per second	2003	2006	1279
<input type="checkbox"/>	00065	Gage height, feet	2003	2006	1264

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notcfs!

USGS 02336526 PROCTOR CREEK AT JACKSON PARKWAY, AT ATLANTA, GA

	Parameter Code	Parameter Name	Period of Approved Daily-Mean Data (Water Year)		
			From	To	count
<input type="checkbox"/>	00010	Temperature, water, degrees Celsius	2003	2006	1131
<input type="checkbox"/>	00060	Discharge, cubic feet per second	2003	2006	1397
<input type="checkbox"/>	00065	Gage height, feet	2003	2006	1281
<input type="checkbox"/>	00095	Specific conductance, water, unfiltered, microsiemens per centimeter at 25 degrees Celsius	2003	2006	1110
<input type="checkbox"/>	00300	Dissolved oxygen, water, unfiltered, milligrams per liter	2003	2006	943

USGS 02336529 PROCTOR CREEK AT NORTHWEST DRIVE NEAR ATLANTA

Parameter Code	Parameter Name	Period of Approved Daily-Mean Data (Water Year)		
		From	To	count
<input type="checkbox"/> 00060	Discharge, cubic feet per second	1995	1998	994

Choose Output Format

Retrieve USGS Surface-Water Annual Statistics for Selected Sites

Choose one of the following options for displaying data for the sites meeting the criteria above:

- ☒ Date range for statistics calculation of all selected parameters -- From: (YYYY) To: <<If blank, use entire period of record for each parameter.
- ☒ ☐ Use incomplete data for statistics calculation
- ☒ Annual statistics based on ☒
- ☒ ☒ Table of annual mean
- ☐ ☒ Tab-separated data * save compressed files with a .gz file extension

[Questions about sites/data?](#)

[Feedback on this web site](#)

Surface Water data for Georgia: USGS Surface-Water Annual Statistics
<http://waterdata.usgs.gov/ga/nwis/annual?>

[Top](#)
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Retrieved on 2007-11-19 15:38:20 EST

Department of the Interior, U.S. Geological Survey

USGS Water Resources of Georgia

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1.42 1.39 nadww01

Locations of Special Concern Animals, Plants and Natural Communities by Quarter Quad Names Starting with (N)

'US' indicates species with federal status (Protected, Candidate or Partial Status). Species that are federally protected in Georgia are also state protected.
'GA' indicates Georgia protected species.

For details for the species below on our special concern lists for [animals](#) and [plants](#).

Date of information - 7/2/2007

NAHUNTA, GA (NE)

- GA · *Balduina atropurpurea* Purple Honeycomb Head
- *Ilex amelanchier* Serviceberry Holly
- GA · *Sarracenia minor* Hooded Pitcherplant

NAHUNTA, GA (NW)

- GA · *Balduina atropurpurea* Purple Honeycomb Head
- *Rhexia nuttallii* Nuttall Meadowbeauty
- GA · *Sarracenia minor* Hooded Pitcherplant
- *Xyris drummondii* Drummond Yellow-eyed Grass

NAHUNTA, GA (SE)

- GA · *Elanoides forficatus* Swallow-tailed Kite
- *Ilex amelanchier* Serviceberry Holly

NAHUNTA, GA (SW)

- *Rhexia nuttallii* Nuttall Meadowbeauty
- *Xyris drummondii* Drummond Yellow-eyed Grass

NANKIN, GA-FL (NE)

- *Ambystoma tigrinum tigrinum* Eastern Tiger Salamander
- *Baptisia lecontei* Leconte Wild Indigo

NANKIN, GA-FL (NW)

- *Agalinis divaricata* Pineland Purple Foxglove
- GA · *Macrochelys temminckii* Alligator Snapping Turtle
- *Pseudemys concinna suwanniensis* Suwannee River Cooter

NANKIN, GA-FL (SE)

- GA · *Aimophila aestivalis* Bachman's Sparrow
- GA · *Alosa alabamae* Alabama Shad
- *Baptisia lecontei* Leconte Wild Indigo
- Cave Cave
- GA · *Macrochelys temminckii* Alligator Snapping Turtle

NANKIN, GA-FL (SW)

- *Baptisia lecontei* Leconte Wild Indigo

NAPIER POND, GA (NE)

GA · *Clemmys guttata* Spotted Turtle

NASHVILLE EAST, GA (NW)

GA · *Rana capito* Gopher Frog

GA · *Sarracenia minor* Hooded Pitcherplant

NASHVILLE EAST, GA (SW)

GA · *Rana capito* Gopher Frog

GA · *Sarracenia minor* Hooded Pitcherplant

NASHVILLE WEST, GA (NE)

GA · *Rana capito* Gopher Frog

GA · *Sarracenia minor* Hooded Pitcherplant

· *Sporobolus teretifolius* Wire-leaf Dropseed

NASHVILLE WEST, GA (NW)

GA · *Macbridea caroliniana* Carolina Bogmint

GA · *Rana capito* Gopher Frog

GA · *Sarracenia minor* Hooded Pitcherplant

NASHVILLE WEST, GA (SE)

GA · *Rana capito* Gopher Frog

GA · *Sarracenia minor* Hooded Pitcherplant

GA · *Sarracenia minor* Hooded Pitcherplant

NASHVILLE WEST, GA (SW)

GA · *Macbridea caroliniana* Carolina Bogmint

GA · *Sarracenia minor* Hooded Pitcherplant

NAYLOR, GA (NE)

· *Pteronotropis metallicus* Metallic Shiner

· *Pteronotropis metallicus* Metallic Shiner

NAYLOR, GA (NW)

US · *Ambystoma cingulatum* Flatwoods Salamander

GA · *Clemmys guttata* Spotted Turtle

GA · *Notophthalmus perstriatus* Striped Newt

GA · *Sarracenia minor* Hooded Pitcherplant

N. JR, GA (SE)

· *Baptisia lecontei* Leconte Wild Indigo

US · *Drymarchon couperi* Eastern Indigo Snake

- *Pteronotropis metallicus* Metallic Shiner
- *Pteronotropis metallicus* Metallic Shiner

NAYLOR, GA (SW)

- I · *Drymarchon couperi* Eastern Indigo Snake
- *Fundulus chrysotus* Golden Topminnow
- *Umbra pygmaea* Eastern Mudminnow

NEBO, GA (SE)

- *Arabis missouriensis* Missouri Rockcress

NEBO, GA (SW)

- *Arabis missouriensis* Missouri Rockcress

NEEDMORE, GA (NE)

- *Calopogon multiflorus* Many-flowered Grass-pink
- *Ophisaurus compressus* Island Glass Lizard

NEEDMORE, GA (NW)

- *Calopogon multiflorus* Many-flowered Grass-pink

NEEDMORE, GA (SE)

- U · *Drymarchon couperi* Eastern Indigo Snake
- *Ophisaurus compressus* Island Glass Lizard

NEELS GAP, GA (NE)

- *Acer spicatum* Mountain Maple
- *Aster phlogifolius* Phlox-leaved Aster
- *Bare rock/lichens, br noncalcareous outcrop* Noncalcareous Outcrop Rock/lichens
- *Bare rock/lichens, br noncalcareous outcrop* Noncalcareous Outcrop Rock/lichens
- *Br shrub bald* Shrub Bald, Heath Bald
- *Br shrub bald* Shrub Bald, Heath Bald
- *Carex appalachica* Appalachian Sedge
- *Carex manhartii* Manhart's Sedge
- *Carex manhartii* Manhart's Sedge
- *Carex scabrata* Sedge
- *Corydalis sempervirens* Pale Corydalis
- GA · *Cypripedium acaule* Pink Ladyslipper
- *Desmognathus folkertsi* Dwarf Black-bellied Salamander
- *Herbaceous veg., br noncalcareous outcrop* Noncalcareous Outcrop Herb Community
- *Herbaceous veg., br noncalcareous outcrop* Noncalcareous Outcrop Herb Community
- *Hypericum buckleii* Blue Ridge St. Johnswort
- *Neotoma floridana haematorea* Southern Appalachian Woodrat
- *Paronychia argyrocoma* Silverling

- *Paronychia argyrocoma* Silverling
- *Rhus typhina* Staghorn Sumac
- *Shrub/scrub veg., br noncalcareous outcrop* Noncalcareous Outcrop Shrub/scrub Community
- *Shrub/scrub veg., br noncalcareous outcrop* Noncalcareous Outcrop Shrub/scrub Community
- GA · *Sibbaldiopsis tridentata* Mountain Cinquefoil
- *Sorbus americana* American Mountain-ash
- GA · *Trientalis borealis* Starflower

NEELS GAP, GA (NW)

- *Acer spicatum* Mountain Maple
- *Aralia nudicaulis* Wild Sarsaparilla
- *Aster phlogifolius* Phlox-leaved Aster
- *Bare rock/lichens, br noncalcareous outcrop* Noncalcareous Outcrop Rock/lichens
- *Bare rock/lichens, br noncalcareous outcrop* Noncalcareous Outcrop Rock/lichens
- *Br shrub bald* Shrub Bald, Heath Bald
- *Br shrub bald* Shrub Bald, Heath Bald
- GA · *Calamagrostis porteri* Porter's Reed-grass
- *Calystegia catesbeiana ssp. sericata* Silky Bindweed
- *Campanula aparinoides* Marsh Bellflower
- *Carex appalachica* Appalachian Sedge
- *Carex appalachica* Appalachian Sedge
- *Cave* Cave
- *Corydalis sempervirens* Pale Corydalis
- GA · *Cryptobranchus alleganiensis alleganiensis* Eastern Hellbender
- C · *Cypripedium acaule* Pink Ladyslipper
- *Cypripedium parviflorum var. pubescens* Large-flowered Yellow Ladyslipper
- *Cypripedium parviflorum var. pubescens* Large-flowered Yellow Ladyslipper
- *Frullania appalachiana* A Liverwort
- *Herbaceous veg., br noncalcareous outcrop* Noncalcareous Outcrop Herb Community
- *Herbaceous veg., br noncalcareous outcrop* Noncalcareous Outcrop Herb Community
- *Herpetineuron toccoeae* A Moss
- *Hypericum buckleii* Blue Ridge St. Johnswort
- *Hypericum buckleii* Blue Ridge St. Johnswort
- *Listera smallii* Appalachian Twayblade
- *Lonicera dioica* Limber Honeysuckle
- *Menziesia pilosa* Minniebush
- *Panax quinquefolius* American Ginseng
- *Paronychia argyrocoma* Silverling
- *Penstemon smallii* Small's Beardtongue
- *Shrub/scrub veg., br noncalcareous outcrop* Noncalcareous Outcrop Shrub/scrub Community
- *Shrub/scrub veg., br noncalcareous outcrop* Noncalcareous Outcrop Shrub/scrub Community
- GA · *Sibbaldiopsis tridentata* Mountain Cinquefoil
- GA · *Silene ovata* Ovate Catchfly
- *Sorbus americana* American Mountain-ash
- *Sorex hoyi* Pygmy Shrew
- *Speyeria diana* Diana Fritillary
- GA · *Trientalis borealis* Starflower

- *Trillium simile* Sweet White Trillium
- *Trillium simile* Sweet White Trillium
- *Vaccinium erythrocarpum* Bearberry

NEELS GAP, GA (SE)

- *Carex scabrata* Sedge
- GA · *Cypripedium acaule* Pink Ladyslipper

NEELS GAP, GA (SW)

- *Aster phlogifolius* Phlox-leaved Aster
- GA · *Cypripedium acaule* Pink Ladyslipper
- *Penstemon smallii* Small's Beardtongue
- *Sorex hoyi* Pygmy Shrew
- *Thermopsis fraxinifolia* Ash-leaf Bush-pea
- *Thermopsis fraxinifolia* Ash-leaf Bush-pea
- *Thermopsis villosa* Aaron's Rod

NELSON, GA (NE)

- *Aster phlogifolius* Phlox-leaved Aster
- *Desmognathus aeneus* Seepage Salamander
- *Eumeces anthracinus anthracinus* Northern Coal Skink
- GA · *Waldsteinia lobata* Barren Strawberry

NELSON, GA (NW)

- *Aster phlogifolius* Phlox-leaved Aster

NELSON, GA (SE)

- US · *Etheostoma scotti* Cherokee Darter
- GA · *Waldsteinia lobata* Barren Strawberry

NELSON, GA (SW)

- Cave Cave
- US · *Etheostoma etowahae* Etowah Darter
- US · *Etheostoma etowahae* Etowah Darter
- US · *Etheostoma scotti* Cherokee Darter
- US · *Etheostoma scotti* Cherokee Darter

NEVILS, GA (NE)

- GA · *Epidendrum conopseum* Greenfly Orchid
- GA · *Sarracenia psittacina* Parrot Pitcherplant
- *Scutellaria mellichampii* Skullcap

NEVILS, GA (NW)

- GA · *Astragalus michauxii* Sandhill Milk-vetch

- GA · *Elliottia racemosa* Georgia Plume
- GA · *Sarracenia flava* Yellow Flytrap
- GA · *Sarracenia minor* Hooded Pitcherplant
- GA · *Stewartia malacodendron* Silky Camellia

GEORGIA, GA (NE)

- US · *Etheostoma scotti* Cherokee Darter

NEW GEORGIA, GA (NW)

- US · *Etheostoma scotti* Cherokee Darter
- US · *Hamiota altilis* Finelined Pocketbook

NEW HOME, GA-AL-TN (NE)

- GA · *Aneides aeneus* Green Salamander
- GA · *Cambarus unestami* Blackbarred Crayfish
 - *Lathyrus palustris* Marsh Wild Pea
- GA · *Phoxinus tennesseensis* Tennessee Dace
 - *Trillium sulcatum* Barksdale Trillium

NEW HOME, GA-AL-TN (NW)

- GA · *Cambarus unestami* Blackbarred Crayfish
 - Cave Cave
- l' · *Haliaeetus leucocephalus* Bald Eagle

NEW HOME, GA-AL-TN (SE)

- *Cambarus tenebrosus* A Crayfish
- GA · *Cambarus unestami* Blackbarred Crayfish
 - Cave Cave
 - *Cyprinella spiloptera* Spotfin Shiner
 - *Etheostoma jessiae* Blueside Darter
 - *Etheostoma rufilineatum* Redline Darter
 - *Lythrurus fasciolaris* Scarlet Shiner
 - *Neotoma floridana illinoensis* Eastern Woodrat
- GA · *Notropis ariommus* Popeye Shiner
 - *Notropis atherinoides* Emerald Shiner

NEW HOME, GA-AL-TN (SW)

- GA · *Cambarus unestami* Blackbarred Crayfish

NEW LOIS, GA (NE)

- G^ · *Gopherus polyphemus* Gopher Tortoise
- G. · *Sarracenia minor* Hooded Pitcherplant

NEW LOIS, GA (NW)

- *Dalea carnea* var. *gracilis* Sprawling White-tassels

GA · *Sarracenia minor* Hooded Pitcherplant

NEW LOIS, GA (SE)

' · *Ambystoma cingulatum* Flatwoods Salamander

US · *Ambystoma cingulatum* Flatwoods Salamander

GA · *Macbridea caroliniana* Carolina Bogmint

GA · *Sarracenia minor* Hooded Pitcherplant

GA · *Sarracenia minor* Hooded Pitcherplant

NEW LOIS, GA (SW)

US · *Ambystoma cingulatum* Flatwoods Salamander

US · *Ambystoma cingulatum* Flatwoods Salamander

- *Dalea carnea* var. *gracilis* Sprawling White-tassels

GA · *Macbridea caroliniana* Carolina Bogmint

GA · *Sarracenia flava* Yellow Flytrap

GA · *Sarracenia minor* Hooded Pitcherplant

GA · *Sarracenia minor* Hooded Pitcherplant

NEWELL, GA (NE)

US · *Mycteria americana* Wood Stork

NEWELL, GA (NW)

GA · *Gopherus polyphemus* Gopher Tortoise

GA · *Neofiber alleni* Round-tailed Muskrat

- *Pituophis melanoleucus mugitus* Florida Pine Snake

- *Quercus chapmanii* Chapman Oak

NEWELL, GA (SE)

GA · *Hartwrightia floridana* Hartwrightia

NEWELL, GA (SW)

GA · *Neofiber alleni* Round-tailed Muskrat

- *Regina alleni* Striped Crayfish Snake

- *Rhynchospira alba* Northern White Beaksedge

NEWNAN NORTH, GA (NW)

GA · *Notropis hypsilepis* Highscale Shiner

NEWNAN SW, GA (SW)

Moxostoma sp. 1 Apalachicola Redhorse

GA · *Notropis hypsilepis* Highscale Shiner

NEWTON, GA (NE)

- *Crataegus brachyacantha* Blueberry Hawthorn
- GA · *Elliptio arctata* Delicate Spike
- US · *Elliptoideus sloatianus* Purple Bankclimber
- US · *Elliptoideus sloatianus* Purple Bankclimber
- US · *Haliaeetus leucocephalus* Bald Eagle
- L · *Haliaeetus leucocephalus* Bald Eagle
- US · *Medionidus penicillatus* Gulf Moccasinsshell
- US · *Medionidus penicillatus* Gulf Moccasinsshell
- US · *Medionidus penicillatus* Gulf Moccasinsshell
- *Physostegia angustifolia* Narrowleaf Obedient Plant

NEWTON, GA (NW)

- GA · *Ameiurus serracanthus* Spotted Bullhead
- *Crataegus brachyacantha* Blueberry Hawthorn
- *Elimia albanyensis* Black-crest Elimia
- GA · *Elliptio arctata* Delicate Spike
- *Elliptio nigella* Winged Spike
- US · *Elliptoideus sloatianus* Purple Bankclimber
- US · *Elliptoideus sloatianus* Purple Bankclimber
- GA · *Graptemys barbouri* Barbour's Map Turtle
- US · *Hamiota subangulata* Shinyrayed Pocketbook
- GA · *Macrochelys temminckii* Alligator Snapping Turtle
- GA · *Macrochelys temminckii* Alligator Snapping Turtle
- US · *Medionidus penicillatus* Gulf Moccasinsshell
- L · *Medionidus penicillatus* Gulf Moccasinsshell
- US · *Medionidus penicillatus* Gulf Moccasinsshell
- *Physostegia angustifolia* Narrowleaf Obedient Plant
- US · *Pleurobema pyriforme* Oval Pigtoe

NEWTON, GA (SE)

- US · *Haliaeetus leucocephalus* Bald Eagle
- US · *Haliaeetus leucocephalus* Bald Eagle
- GA · *Heterodon simus* Southern Hognose Snake

NEWTON, GA (SW)

- US · *Amblema neislerii* Fat Threeridge
- GA · *Ameiurus serracanthus* Spotted Bullhead
- *Elimia albanyensis* Black-crest Elimia
- GA · *Elliptio arctata* Delicate Spike
- US · *Elliptoideus sloatianus* Purple Bankclimber
- US · *Elliptoideus sloatianus* Purple Bankclimber
- GA · *Graptemys barbouri* Barbour's Map Turtle
- L · *Hamiota subangulata* Shinyrayed Pocketbook
- US · *Hamiota subangulata* Shinyrayed Pocketbook
- GA · *Leitneria floridana* Corkwood
- GA · *Macrochelys temminckii* Alligator Snapping Turtle

- GA · *Macrochelys temminckii* Alligator Snapping Turtle
- US · *Medionidus penicillatus* Gulf Moccasinshell
- US · *Medionidus penicillatus* Gulf Moccasinshell
- US · *Medionidus penicillatus* Gulf Moccasinshell
- US · *Pleurobema pyriforme* Oval Pigtoe
- US · *Pleurobema pyriforme* Oval Pigtoe
- GA · *Sideroxylon thornei* Swamp Buckthorn
 - *Villosa villosa* Downy Rainbow

NEYAMI, GA (NE)

- GA · *Clemmys guttata* Spotted Turtle
- GA · *Procambarus gibbus* Muckalee Crayfish
 - *Rhexia aristosa* Awned Meadowbeauty

NEYAMI, GA (NW)

- *Lobelia boykinii* Boykin Lobelia
- *Nerodia floridana* Florida Green Water Snake
- US · *Oxypolis canbyi* Canby Dropwort
 - *Plantago sparsiflora* Pineland Plantain
- GA · *Procambarus gibbus* Muckalee Crayfish
 - *Rhexia aristosa* Awned Meadowbeauty
- GA · *Sarracenia minor* Hooded Pitcherplant

NEYAMI, GA (SE)

- GA · *Elliptio purpurella* Inflated Spike
- US · *Hamiota subangulata* Shinyrayed Pocketbook
- US · *Medionidus penicillatus* Gulf Moccasinshell
- US · *Oxypolis canbyi* Canby Dropwort
- US · *Pleurobema pyriforme* Oval Pigtoe
- GA · *Procambarus gibbus* Muckalee Crayfish
 - *Rhexia aristosa* Awned Meadowbeauty
- GA · *Stewartia malacodendron* Silky Camellia

NEYAMI, GA (SW)

- *Lobelia boykinii* Boykin Lobelia
- US · *Oxypolis canbyi* Canby Dropwort
 - *Rhexia aristosa* Awned Meadowbeauty

NICHOLLS, GA (SW)

- GA · *Clemmys guttata* Spotted Turtle
- US · *Drymarchon couperi* Eastern Indigo Snake
- US · *Sarracenia psittacina* Parrot Pitcherplant

NICKAJACK GAP, GA (NE)

- GA · *Etheostoma duryi* Black Darter
 - *Etheostoma jessiae* Blueside Darter
 - *Etheostoma rufilineatum* Redline Darter
- GA · *Hemitremia flammea* Flame Chub
 - *Lythrurus fasciolaris* Scarlet Shiner
 - Mountain spring Mountain Spring
 - *Percina evides* Gilt Darter
- GA · *Percina sciera* Dusky Darter
 - *Pleurocera pyrenella* Skirted Hornsnail

NICKAJACK GAP, GA (NW)

- *Etheostoma jessiae* Blueside Darter
- *Etheostoma rufilineatum* Redline Darter
- *Etheostoma rufilineatum* Redline Darter
- GA · *Hydrastis canadensis* Goldenseal
- GA · *Hydrastis canadensis* Goldenseal
- GA · *Leavenworthia exigua* var. *exigua* Least Gladecress
- GA · *Percina sciera* Dusky Darter
 - *Pleurocera pyrenella* Skirted Hornsnail

NICKAJACK GAP, GA (SE)

- GA · *Cypripedium acaule* Pink Ladyslipper
 - *Isoetes appalachiana* Bigspore Engelmann's Quillwort
- C · *Percina sciera* Dusky Darter

NICKAJACK GAP, GA (SW)

- *Etheostoma coosae* Coosa Darter
- *Etheostoma jessiae* Blueside Darter
- *Etheostoma rufilineatum* Redline Darter
- GA · *Hydrastis canadensis* Goldenseal
- GA · *Hydrastis canadensis* Goldenseal

NICKLESVILLE, GA (SE)

- GA · *Cambarus truncatus* Oconee Burrowing Crayfish

NIMBLEWILL, GA (NE)

- GA · *Cypripedium acaule* Pink Ladyslipper
 - *Eumeces anthracinus anthracinus* Northern Coal Skink

NIMBLEWILL, GA (NW)

- *Aster phlogifolius* Phlox-leaved Aster
- Carex manhartii* Manhart's Sedge
- *Carex manhartii* Manhart's Sedge
- GA · *Cypripedium acaule* Pink Ladyslipper

- *Cypripedium parviflorum* var. *pubescens* Large-flowered Yellow Ladyslipper
- GA · *Hydrastis canadensis* Goldenseal
- *Melanthium latifolium* Broadleaf Bunchflower
 - *Pituophis melanoleucus melanoleucus* Northern Pine Snake
 - *Sorex hoyi* Pygmy Shrew

NIMBLEWILL, GA (SE)

- *Calycanthus brockiana* Brock Sweetshrub

NIMBLEWILL, GA (SW)

- *Aster phlogifolius* Phlox-leaved Aster
- GA · *Etheostoma brevirostrum* Holiday Darter
- US · *Etheostoma etowahae* Etowah Darter
- GA · *Hydrastis canadensis* Goldenseal
- GA · *Percina* sp. 3 Muscadine Darter
- *Pituophis melanoleucus melanoleucus* Northern Pine Snake

NOONTOTLA, GA (NE)

- GA · *Cryptobranchus alleganiensis alleganiensis* Eastern Hellbender
- *Etheostoma rufilineatum* Redline Darter
- GA · *Etheostoma vulneratum* Wounded Darter
- *Etheostoma zonale* Banded Darter
 - *Lycopodium clavatum* Ground Pine
 - *Panax quinquefolius* American Ginseng
- GA · *Percina aurantiaca* Tangerine Darter
- *Percina evides* Gilt Darter
- GA · *Percina squamata* Olive Darter

NOONTOTLA, GA (NW)

- GA · *Cryptobranchus alleganiensis alleganiensis* Eastern Hellbender
- GA · *Cypripedium acaule* Pink Ladyslipper
- US · *Isotria medeoloides* Small Whorled Pogonia
- *Panax trifolius* Dwarf Ginseng

NOONTOTLA, GA (SE)

- GA · *Cypripedium acaule* Pink Ladyslipper
- *Cypripedium parviflorum* var. *pubescens* Large-flowered Yellow Ladyslipper
 - *Cypripedium parviflorum* var. *pubescens* Large-flowered Yellow Ladyslipper
 - *Desmognathus aeneus* Seepage Salamander
 - *Eumeces anthracinus anthracinus* Northern Coal Skink
- US · *Isotria medeoloides* Small Whorled Pogonia
- *Listera smallii* Appalachian Twayblade
 - *Lycopodium clavatum* Ground Pine
 - *Lygodium palmatum* Climbing Fern
- GA · *Megaceros aenigmaticus* Bighorn Hornwort

- *Melanthium latifolium* Broadleaf Bunchflower
- *Melanthium latifolium* Broadleaf Bunchflower
- *Neotoma floridana haematoreia* Southern Appalachian Woodrat

NOONTOTLA, GA (SW)

- GA · *Cypripedium acaule* Pink Ladyslipper
- *Cypripedium parviflorum* var. *pubescens* Large-flowered Yellow Ladyslipper
 - *Desmognathus aeneus* Seepage Salamander
 - *Lycopodium clavatum* Ground Pine
 - *Panax quinquefolius* American Ginseng

NORCROSS, GA (NE)

- *Panax quinquefolius* American Ginseng

NORCROSS, GA (SE)

- *Panax quinquefolius* American Ginseng

NORMAN PARK, GA (NE)

- GA · *Balduina atropurpurea* Purple Honeycomb Head
- GA · *Sarracenia flava* Yellow Flytrap
- GA · *Sarracenia minor* Hooded Pitcherplant
- GA · *Sarracenia psittacina* Parrot Pitcherplant
- *Stokesia laevis* Stokes Aster

NORMAN PARK, GA (NW)

- GA · *Balduina atropurpurea* Purple Honeycomb Head
- *Platanthera nivea* Snowy Orchid
- GA · *Sarracenia flava* Yellow Flytrap
- *Stokesia laevis* Stokes Aster

NORMAN PARK, GA (SE)

- *Stokesia laevis* Stokes Aster

NORMAN PARK, GA (SW)

- GA · *Balduina atropurpurea* Purple Honeycomb Head

NORRISTOWN, GA (NE)

- GA · *Astragalus michauxii* Sandhill Milk-vetch
- *Cp xeric broadleaf decid.-needleleaf ever. forest* Sand Ridge Forest
 - *Liatris pauciflora* Few-flower Gay-feather
 - (*Nestronia umbellula* Indian Olive
- GA · *Notophthalmus perstriatus* Striped Newt
- *Phaseolus polystachios* var. *sinuatus* Trailing Bean-vine
- GA · *Sarracenia flava* Yellow Flytrap

- GA · *Sarracenia psittacina* Parrot Pitcherplant
- *Sporobolus teretifolius* Wire-leaf Dropseed

NORRISTOWN, GA (NW)

- C · *Astragalus michauxii* Sandhill Milk-vetch
- GA · *Ceratiola ericoides* Sandhill Rosemary
- GA · *Nestronia umbellula* Indian Olive
- US · *Picoides borealis* Red-cockaded Woodpecker
- GA · *Sarracenia flava* Yellow Flytrap

NORRISTOWN, GA (SE)

- GA · *Astragalus michauxii* Sandhill Milk-vetch
- GA · *Ceratiola ericoides* Sandhill Rosemary
- GA · *Sarracenia flava* Yellow Flytrap
- GA · *Sarracenia psittacina* Parrot Pitcherplant

NORRISTOWN, GA (SW)

- GA · *Astragalus michauxii* Sandhill Milk-vetch
- GA · *Ceratiola ericoides* Sandhill Rosemary
- GA · *Cordulegaster sayi* Say's Spiketail
- US · *Drymarchon couperi* Eastern Indigo Snake
- GA · *Epidendrum conopseum* Greenfly Orchid
- GA · *Gopherus polyphemus* Gopher Tortoise
- C · *Nestronia umbellula* Indian Olive
- *Notropis chalybaeus* Ironcolor Shiner
- *Peltandra sagittifolia* Arrow Arum
- US · *Picoides borealis* Red-cockaded Woodpecker
- GA · *Sarracenia flava* Yellow Flytrap

NORTH AUGUSTA, SC-GA (SW)

- GA · *Fusconaia masoni* Atlantic Pigtoe
- US · *Symphyotrichum georgianum* Georgia Aster
- US · *Symphyotrichum georgianum* Georgia Aster

NORTHEAST ATLANTA, GA (NW)

- GA · *Schisandra glabra* Bay Star-vine

NORTHEAST ATLANTA, GA (SE)

- GA · *Schisandra glabra* Bay Star-vine

NORTHEAST ATLANTA, GA (SW)

- G. · *Cambarus howardi* Chattahoochee Crayfish
- *Panax quinquefolius* American Ginseng
- *Pd mesic broadleaf decid. forest* Piedmont Mesic Hardwood Forest

GA · *Schisandra glabra* Bay Star-vine

GA · *Schisandra glabra* Bay Star-vine

NORTHWEST ATLANTA, GA (NE)

Elliptio arctata Delicate Spike 50 Ag.

GA · *Elliptio arctata* Delicate Spike

· *Elliptio fraterna* Brother Spike 25(?) Ag.

GA · *Fothergilla major* Mountain Witch-alder 50

· *Quincuncina infucata* Sculptured Pigtoe 25(?) Ag.

GA · *Schisandra glabra* Bay Star-vine 50

GA · *Schisandra glabra* Bay Star-vine

US · *Symphyotrichum georgianum* Georgia Aster

NORTHWEST ATLANTA, GA (NW)

GA · *Cambarus howardi* Chattahoochee Crayfish 50 Ag.

GA · *Cambarus howardi* Chattahoochee Crayfish

GA · *Elliptio arctata* Delicate Spike

GA · *Elliptio arctata* Delicate Spike

· *Elliptio fraterna* Brother Spike

GA · *Fothergilla major* Mountain Witch-alder

· *Melanthium latifolium* Broadleaf Bunchflower 25(?)

GA · *Nestronia umbellula* Indian Olive (50)

· *Quincuncina infucata* Sculptured Pigtoe

GA · *Schisandra glabra* Bay Star-vine

GA · *Schisandra glabra* Bay Star-vine

US · *Symphyotrichum georgianum* Georgia Aster

NORTHWEST ATLANTA, GA (SE)

GA · *Elliptio arctata* Delicate Spike

GA · *Elliptio arctata* Delicate Spike

GA · *Falco peregrinus* Peregrine Falcon (50)

GA · *Schisandra glabra* Bay Star-vine

US · *Symphyotrichum georgianum* Georgia Aster

NORTHWEST ATLANTA, GA (SW)

GA · *Elliptio arctata* Delicate Spike

GA · *Elliptio arctata* Delicate Spike

GA · *Schisandra glabra* Bay Star-vine

US · *Symphyotrichum georgianum* Georgia Aster

NOTTELY DAM, GA-NC (NE)

GA · *Cypripedium acaule* Pink Ladyslipper

NOTTELY DAM, GA-NC (NW)

GA · *Cryptobranchus alleganiensis alleganiensis* Eastern Hellbender

NOTTELY DAM, GA-NC (SE)

- *Dicentra canadensis* Squirrel-corn
- *Haliaeetus leucocephalus* Bald Eagle
- *Mustela nivalis* Least Weasel
- *Spiraea tomentosa* Hardhack

NOTTELY DAM, GA-NC (SW)

- *Carex scabrata* Sedge
- *Spiraea tomentosa* Hardhack

NUNEZ, GA (NW)

GA · *Sarracenia minor* Hooded Pitcherplant

NUNEZ, GA (SE)

- GA · *Ceratiola ericoides* Sandhill Rosemary
- GA · *Clemmys guttata* Spotted Turtle
- *Lachnocaulon beyrichianum* Southern Bog-button
- GA · *Sarracenia minor* Hooded Pitcherplant

NUNEZ, GA (SW)

- *Ceratiola ericoides* Sandhill Rosemary
 - *Lachnocaulon beyrichianum* Southern Bog-button
- GA · *Penstemon dissectus* Cutleaf Beardtongue
- GA · *Sarracenia minor* Hooded Pitcherplant
- GA · *Sideroxylon macrocarpum* Ohoopee Bumelia

NOTE: This is a working list and is constantly revised ([see element occurrence data disclaimer](#)). For the latest changes, acknowledgment of numerous sources, interpretation of data, or other information connected with this list, please contact:

Greg Krakow - Data Manager
Georgia Department of Natural Resources
Wildlife Resources Division
Georgia Natural Heritage Program
2065 U.S. Hwy 278 S.E.
Social Circle, Georgia 30025-4743
Phone: (770)918-6411
Fax: (706)557-3033
Click [here](#) to send e-mail

Locations of Special Concern Animals, Plants and Natural Communities in Fulton County, Georgia

'US' indicates species with federal status (Protected, Candidate or Partial Status). Species that are federally protected in Georgia are also state protected.
'GA' indicates Georgia protected species.

Find details for the species below on our special concern lists for [animals](#) and [plants](#).

Date of information - 7/2/2007

Animals

- GA · *Aimophila aestivalis* Bachman's Sparrow
- GA · *Cambarus howardi* Chattahoochee Crayfish
- GA · *Cyprinella callitaenia* Bluestripe Shiner Ag.
- GA · *Elliptio arctata* Delicate Spike
- US · *Etheostoma scotti* Cherokee Darter Ag. U.S. T (Ref. 45)
- GA · *Falco peregrinus* Peregrine Falcon
- US · *Hamiodonta subangulata* Shinyrayed Pocketbook Ag. U.S. E (Ref. 45) clam
- *Hemidactylium scutatum* Four-toed Salamander Ag.
- US · *Medionidus penicillatus* Gulf Moccasinshell Ag. U.S. E (Ref. 45) clam
- GA · *Notropis hypsilepis* Highscale Shiner Ag.
- *Quincuncina infucata* Sculptured Pigtoe Ag.

Plants

- GA · *Cypripedium acaule* Pink Ladyslipper 50
- *Cypripedium parviflorum* var. *pubescens* Large-flowered Yellow Ladyslipper 25(?)
- *Dryopteris celsa* Log Fern 25(?)
- GA · *Fothergilla major* Mountain Witch-alder
- *Hexastylis shuttleworthii* var. *harperi* Harper Wild Ginger 25(?)
- *Listera australis* Southern Twayblade 25(?)
- GA · *Monotropsis odorata* Sweet Pinesap 50
- *Panax quinquefolius* American Ginseng 25(?)
- GA · *Schisandra glabra* Bay Star-vine
- US · *Symphyotrichum georgianum* Georgia Aster U.S. E (Ref. 45)
- GA · *Waldsteinia lobata* Barren Strawberry 50

Natural Communities

No natural communities listed in Fulton county.

NOTE: This is a working list and is constantly revised (see [element occurrence data disclaimer](#)). For the latest changes, acknowledgment of numerous sources, interpretation of data, or other information connected with this list, please contact:

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Click [here](#) to send e-mail

RECORD OF TELEPHONE CONVERSATION
HAZARDOUS WASTE MANAGEMENT BRANCH

DATE: 11-21-07

TIME: 1315

SUBJECT: Proctor Ch. Fishes

SPOKE WITH: 7) 918-6418

Chris Martin

R 3

TELEPHONE#:

Sr Fisheries Biologist

ISSUE:

never lost in

QJ Mader

SUMMARY OF CALL:

→ Res X e (3)

~~Thomson (796) 395-1619~~

(770) 918 6418

Sexual
Corch

People do fish Ch. H. Hatcher
Proctor Ch. probably but uncertain.
exp. lower reach,

FOLLOW-UP RESPONSES/ADDITIONAL COMMENTS:

PRINTED NAME: Lawrence Papetti

SIGNATURE:



RECORD OF TELEPHONE CONVERSATION
HAZARDOUS WASTE MANAGEMENT BRANCH

DATE: 11-21-07 Cont'd

TIME: 1315

SUBJECT:

SPOKE WITH:

TELEPHONE#:

ISSUE:

SUMMARY OF CALL:

Went to P-Tech Ch.
Working to de-c (a/r/r) as
first this stretch of Chattahoochee
People probably fish bass lot of Procter Ch.
fish, activity Procter likely, not
Chatt Bass L-mo's shad Carp Suckers
Sunfish Hickory Shiner
shiner

FOLLOW-UP RESPONSES/ADDITIONAL COMMENTS:

PRINTED NAME: Lawrence Papetti

SIGNATURE: 

In Lawrence
Pettit
Chatt.

AZS

2 groups of ponds cont. 11W waters

series ponds - CW cont. goes offsite

United Real Properties bought all but the ponds
in 1990's

AZS - paper corp. / ^{"part of"} Josoh, Japanese Co /

EPD Had a big mtg Christmastime - AZS, United Real
Jan 9th, 2008. Properties